

Larry W. Lee (State Bar No. 228175)
Max W. Gavron (State Bar No. 291697)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com
mgavron@diversitylaw.com

Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

CASSANDRA NEGRETE, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

WINSUPPLY INC., a Delaware
corporation; ORANGE COUNTY
WINDUSTRIAL CO., a Delaware
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 30-2021-01188066-CU-OE-CXC

(Assigned for all purposes to the Hon. Randall J.
Sherman, Dept. CX105)

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: July 14, 2023

Time: 10:00 a.m.

Dept.: CX105

Complaint Filed: March 9, 2021

FAC Filed: April 13, 2022

SAC Filed: January 19, 2023

Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I, Larry W. Lee, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Diversity Law Group, counsel of record for Plaintiff Sandra Negrete (“Plaintiff”). I have personal knowledge of the facts set forth below and if called upon I could and would do so competently.

2. The Class Notice provided Class Members with my office's contact information, they could further seek information regarding the settlement, leave questions for the Settlement Administrator, and update their address. As part of the settlement process, I have received a number of phone calls from Class Members regarding this settlement, all of whom I have responded to.

3. There were no objections to the amount of attorney's fees or litigation costs that Counsel seek in this case and for which Plaintiff asks the Court for final approval.

4. The Joint Stipulation of Class Action and PAGA Settlement was the product of negotiation between highly able and experienced attorneys on both sides who possessed the best data and extensive legal research which they had carefully analyzed. Class Counsel conducted extensive factual investigation before settling, including reviewing class data. This required Plaintiff to conduct a full damage analysis.

5. The settlement in the case at bar warrants approval and carries a presumption of fairness. As previously noted in the application for Preliminary Approval, this current settlement was negotiated at arm's length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Class Members as a whole.

6. I have been approved as class counsel in numerous other wage/hour class actions and have been granted class certification and final approval.

7. To date, I have incurred approximately 107.3 hours in connection with the litigation lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred to date. I anticipate spending approximately an additional 10 hours handling post-approval matters. This is time spent conferring with settlement class members, responding to the administrator, and

1 conferring with counsel and reviewing post-approval filings.

2 8. Including 10 anticipated hours, the total lodestar for my hours will be approximately
3 \$93,840.00 based on an hourly rate of \$800.00 per hour. Since at least 2020, I have been approved
4 at an hourly rate of \$750.00 per hour by various Courts. Examples of these Courts include the
5 following cases: *Hernandez v. Wells Fargo Bank*, Santa Clara County Superior Court Case No.
6 16CV299319, *Carrillo v. New Balance Athletics, Inc.*, Santa Clara County Superior Court Case No.
7 19CV352469; *Ramirez v. Walgreen Co.*, United States District Court, Northern District of
8 California Case No. 18-cv-03921-EJD, *Chavez v. Converse, Inc.*, United States District Court,
9 Northern District of California Case No. 15-cv-03746-NC; *Foster v. Schindler Elevator*
10 *Corporation*, Alameda County Superior Court Case No. RG19029640; *Foaad Hanna v. Equinix,*
11 *LLC*, Santa Clara County Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*,
12 Los Angeles County Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville*
13 *Community Hospital*, Santa Cruz County Superior Court Case No. 18CV00191; *Pittman v.*
14 *Martinez Steel Corporation*, San Bernardino County Superior Court Case No. CIVDS1823132;
15 *Michael Randolph v. Pacific Racing Association*, Alameda County Superior Court Case No.
16 RG18908139; *Markham v. Quik Stop Markets, Inc.*, Santa Clara County Superior Court Case
17 No.19CV341582; *Siron v. Raypak, Inc.*, Ventura County Superior Court Case No. 56-2019-
18 005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San Bernardino County Superior Court
19 Case No. CIVDS1828867, and *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*,
20 Santa Clara County Superior Court Case No. 19CV345211. I was approved at an hourly rate of
21 \$800.00 per hour in *Martinez and Acosta v. City of Hope National Medical Center, et al.*, San
22 Bernardino County Superior Court Case No. CIVDS2015729, *Jaime Moen v. Genentech, Inc.*, San
23 Diego County Superior Court Case No. 37-2021-00008619-CU-OE-CTL, *Murray v. Granite*
24 *Wellness Centers et al.*, Nevada County Superior Court Case No. CU20-084680, and *Smith, et al. v.*
25 *Clean Harbors Environmental Services, Inc.*, Sacramento County Superior Court Case No. 34-
26 2021-00292526.

27 //

28 //

1 9. My qualifications are as follows: I received my JD from Arizona State University
2 College of Law in 2003. During law school, I was a summer associate at the law firm of Brobeck,
3 Phleger & Harrison. I graduated *cum laude* from Arizona State University College of Law in the
4 top 10% of my class. While I was in law school, I was the Associate Managing Editor of the
5 Arizona State University College of Law, Law Journal. For more than one and one-half years after
6 graduating from law school, I practiced law as an associate at the Los Angeles County offices of
7 Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm,
8 representing Fortune 500 companies in employment matters, including wage and hour class actions.

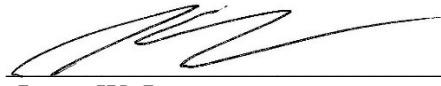
9 10. My firm's primary focus is employment law. I have handled a number of wage and
10 hour matters including class actions and multiple-plaintiff actions. I have a practice that
11 encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the
12 San Francisco County Superior Courts, the San Diego County Superior Courts, and the United
13 States District Courts for the Central, Eastern and Northern Districts of California.

14 11. I have been named as class counsel in a number of class actions that have been
15 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
16 Francisco County, and other counties, and the United States District Court for the Central District
17 of California, including the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San
18 Francisco Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange
19 County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case
20 No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior
21 Court, Judicial Council Coordination Proceeding No. 4480; *Hernandez v. CVS Corp. et al.*, Judicial
22 Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court
23 Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey
24 County Superior Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara
25 Superior Court Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall,*
26 *Inc.*, Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*,
27 Yolo County Superior Court Case No. CV-18-558.

28 I declare under penalty of perjury under the laws of the State of California that the foregoing

1 is true and correct.

2 Executed on this 21st day of June 2023, at Los Angeles, California.

3 

4 Larry W. Lee

EXHIBIT A

Negrete v. Winsupply Inc.
Larry W. Lee Time and Task Chart

Hours	Description of Work
17.3	Review client documents and background information; confer with co-counsel re claims to be filed; background research re relationship between corporate defendant and alleged franchises; review documents re corporate structure re same
8.9	Draft PAGA letter; review and revise class and PAGA complaints
4.6	Review and revise CMC statements; review notices re same; confer with counsel re same
6.6	Review and revise first set of written discovery to Defendant
14.8	Confer with counsel re mediation and data needed for mediation; review class member data for mediation
18.6	Review and revise mediation brief; further legal research re joint employer issues; attend mediation
2.6	Review and revise MOU
7.8	Review and revise long form settlement agreement; confer with counsel re changes to same
13.8	Review and revise Motion for Preliminary Approval and supporting documents; review tentative rulings re same; review and revise supplemental documents for same; attend hearings re same
8.1	Confer with class members re settlement issues
4.2	Review and revise Motion for Final Approval and supporting documents
107.3	TOTAL HOURS