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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
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: August 19, 2022
Time: 10:00 a.m.
Dept.: CX105

Reservation Number: 73761897

Complaint Filed: March 9, 2021
FAC Filed: April 13, 2022
Trial Date: None Set

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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 Cassandra Negrete (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Class Counsel have zealously represented the interests of the Class. The settlement was obtained for the benefit of the Class, as opposed to the individual Class Representative. Further, Class Counsel have been approved as class counsel on a number of prior cases, have litigated numerous other class action cases, and are competent to represent the class.

3. Both Plaintiff's and Defendants' counsel have a great deal of experience in wage and hour class action litigation. Plaintiff's counsel have been approved as class counsel in a number of wage and hour class actions.

4. Based on my review of all the information, and based on my experience in class action litigation, I believe this settlement to be fair, adequate, and reasonable.

5. I was retained based upon a contingency fee arrangement wherein Plaintiff's counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiff failed to prevail in this case, counsel for Plaintiff would have spent a significant amount of time, money and other resources without any benefit or return. In addition, had Plaintiff also failed to prevail in the present case, Defendants would have been able to seek attorney's fees and costs in connection with their defense of the case.

6. I have spent significant time researching and pursuing the claims that have been alleged in this action. The Parties engaged in informal discovery, with the production of documents and payroll information.

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1 7. I am one of the primary attorneys on this matter. My qualifications are as follows: I
2 received my J.D. from Arizona State University College of Law in 2003. During law school, I was
3 a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude from
4 Arizona State University College of Law in the top 10% of my class. While I was in law school, I
5 was the Associate Managing Editor of the Arizona State University College of Law, Law Journal.
6 Upon graduation, I practiced law as an associate at the Los Angeles County offices of Ogletree
7 Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm that represents a
8 significant number of Fortune 500 companies.

9 8. 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 9. 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 17th day of May 2022, at Los Angeles, California.

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Larry W. Lee