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Mai Tulyathan (State Bar No. 316704)  
**DIVERSITY LAW GROUP, P.C.**  
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Attorneys for Plaintiff and the Aggrieved Employees

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

TASHA COLE, as an individual and on behalf  
of all others similarly situated,

Plaintiff,

vs.

NORTHCENTRAL PIZZA, LLC, a California  
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 34-2021-00299158-CU-OE-GDS

**DECLARATION OF LARRY W. LEE IN  
SUPPORT OF PLAINTIFF'S  
UNOPPOSED MOTION TO APPROVE  
SETTLEMENT AGREEMENT  
PURSUANT TO THE PRIVATE  
ATTORNEYS GENERAL ACT**

Date: July 12, 2022

Time: 9:00 a.m.

Dept.: 54

**Reservation No.: 2649437**

Complaint Filed: April 21, 2021

Trial Date: None Set

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I, Larry W. Lee, declare as follows:

1. I am an attorney at law duly admitted to practice before all courts in the State of Virginia and am a member of the law firm of the Diversity Law Group, P.C., one of the attorneys of record for Plaintiff Tasha Cole (“Plaintiff”) in the above-entitled action. I have personal knowledge of the matters set forth herein, and if called upon as a witness to testify in this matter, I could and would competently do so.

2. After taking into account sharply disputed factual and legal issues involved in the litigation, the risks attending further prosecution, and the substantial benefits to be realized pursuant to the compromise and settlement of the litigation, I have concluded that the settlement on the terms hereinafter set forth is appropriate and in the best interests of the parties and that this settlement is fair and reasonable.

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

4. I have handled a number of wage and hour matters including class actions and representative-plaintiff actions. I have a practice that encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior Courts, the San Diego County Superior Courts, and the United States District Courts for the Southern, Eastern and Northern Districts of California.

5. I have been named as Class Counsel in a number of class actions that have been given final approval by the Superior Courts of Los Angeles County, Orange County, San Diego County, and the United States District Court for the Central District of California,

1 including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco  
2 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange  
3 County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California  
4 Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County  
5 Superior Court, Judicial Council Coordination Proceeding No. 4480; and *Hernandez v. CVS*  
6 *Corp. et al.*, Judicial Council Coordination Proceeding No. 4539.

7 I declare under penalty of perjury under the laws of the State of California that the  
8 foregoing is true and correct.

9 Executed on this 17th day of June 2022, at Los Angeles, California.

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