

DIVERSITY LAW GROUP, P.C.
Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
Simon L. Yang (State Bar No. 260286)
sly@diversitylaw.com
515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
Telephone: (213) 488-6555
Facsimile: (213) 488-6554

Attorneys for Plaintiffs Nasr and Samonte and the Class

POLARIS LAW GROUP
William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com
501 San Benito Street, Suite 200
Hollister, California 95023
Telephone: (831) 531-4214
Facsimile: (831) 634-0333

Attorneys for Plaintiff Samonte and the Class

[Additional Counsel on Following Page]

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

JASON NASR, JACK SAMONTE, GIL
MICHAELI, and MYESHA WILLIAMS, as
individuals and on behalf of all others similarly
situated, and as private attorneys general,

Plaintiffs,

vs.

SAN JOAQUIN VALLEY REHABILITATION
HOSPITAL, a Delaware limited liability
company; and DOES 1 through 50, inclusive,

Defendants.

Case No. MCV084862

[Assigned to Hon. Michael Jurkovich, Dept. 44]

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 28, 2026
Time: 8:30 a.m.
Department: Temporary Remote Department

Complaint Filed: March 16, 2021
FAC Filed: May 6, 2021
SAC Filed: May 22, 2025

1 Shaun Setareh (SBN 204514)

shaun@setarehlaw.com

2 Tyson Gibb (SBN 339154)

tyson@setarehlaw.com

3 SETAREH LAW GROUP

420 North Camden Drive

4 Beverly Hills, California 90210

Telephone: (310) 888-7771

5 Facsimile: (310) 888-0109

6 Attorneys for Plaintiff Michaeli

7 Carolyn Hunt Cottrell (SBN 166977)

Ori Edelstein (SBN 268145)

8 Michelle S. Lim (SBN 315691)

SCHNEIDER WALLACE COTTRELL KONECKY LLP

9 2000 Powell Street, Suite 1400

Emeryville, California 94608

10 Tel: (415) 421-7100

Fax: (415) 421-7105

11 ccottrell@schneiderwallace.com

loedlestein@schneiderwallace.com

12 mlim@schneiderwallace.com

13 Attorneys for Plaintiff Williams

1 I, Larry W. Lee, declare as follows:

2 1. I am an attorney admitted to practice in the State of California and, with the law firm
3 Diversity Law Group, P.C., am counsel of record for Plaintiffs Jason Nasr and Jack Samonte. I make
4 this declaration on the basis of my own personal knowledge, except as to those matters stated on
5 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
6 testify competently as to the facts stated in this declaration.

7 2. From the inception of the case, Class Counsel has zealously represented the interests of
8 the Class. Class Counsel engaged in significant discussions with opposing counsel to obtain discovery
9 and classwide data on behalf of the Class. This settlement was obtained for the benefit of the Class, as
10 opposed to the individual Class Representatives.

11 3. I have spent significant time researching and pursuing the claims that have been alleged
12 in this action. I engaged in numerous discussions with Defendants' counsel and formal and informal
13 discovery that included the exchange of class data and Defendants' pertinent policies and practices.
14 Although I am confident that litigation of the claims would result in a classwide judgment against
15 Defendants, I recognize the inherent risks in litigation, including the specific risks that class certification
16 could be denied, liability could not be established at trial, or the applicable law could change, as well as
17 the potential for appeals and the costs of pursuing litigation. Based on my review of all the information,
18 and based on my experience in class action litigation, I believe this settlement to be fair, adequate, and
19 reasonable.

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

26 5. I am one of the primary attorneys on this matter. My qualifications are as follows: I
27 received my J.D. from Arizona State University College of Law in 2003. During law school, I was a
28 summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude from Arizona

1 State University College of Law in the top 10% of my class. While I was in law school, I was the
2 Associate Managing Editor of the Arizona State University College of Law, Law Journal. Upon
3 graduation, I practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash
4 Smoak & Stewart, P.C., a national employment defense law firm that represents a significant number of
5 Fortune 500 companies.

6 6. My firm's primary focus is employment law. I have handled a number of wage and hour
7 matters including class actions and multiple-plaintiff actions. I have a practice that encompasses cases in
8 the Superior Courts of California for the Counties of Alameda, Los Angeles, Orange, Riverside,
9 Sacramento, San Bernardino, San Diego, San Francisco, Santa Barbara, and Santa Clara, among others,
10 as well as the United States District Courts for the Central, Eastern, Northern, and Southern Districts of
11 California.

12 7. I have been approved as Class Counsel in a number of class actions, including but not
13 limited to *Chan-Lanier v. Citibank* (Case No. CGC-050445143); *Hernandez v. CVS Pharmacy, Inc.*
14 (Judicial Council Coordination Proceeding No. 4539), *Tse v. Best Buy Co, Inc.* (Case Number BC
15 393717), *Orgeta v. AIG, Inc* (Case Number CV 06—196-RSWL (PJWx)), and *Castro v. UPS Freight,*
16 *Inc.* (Case Number CV 08-4898 ODW (CWx)), and *Chavez v. PVH* (Case No. C 13-01797 LHK).

17 8. In addition, I was certified as class counsel by the United States District Court, Central
18 District of California in the cases *Abdullah v. U.S. Security* (Case Number CV 09-09554 GHK), *Avilez*
19 *v. Pinkerton Government Services, Inc.* (Case Number SACV 11-0493-DOC), *Dynabursky v. Allied*
20 *Barton Security Services* (Case Number SACV 12-02210 JST); and *Pace v. PetSmart, Inc.* (Case
21 Number SACV 13-500-DOC); by the Northern District of California in the cases of *Harris v. Vector*
22 *Marketing Corp.,* (Case Number CV 08 5198 EMC), and *Lemus et al. v. H&R Block Enterprises, LLC*
23 (Case Number CV-09-03179-SI); and by the Superior Court of California, Orange County in the cases
24 of *De la Cruz v. Abercrombie & Fitch Co. et al.* (Case Number 30-2007-00036240) and *Wu v. General*
25 *Nutrition Corporation* (Case Number 30-2012-00593759), all as part of the Courts' orders granting class
26 certification pursuant to Rule 23 of the FRCP and California Code of Civil Procedure § 382. I served as
27 lead counsel on these cases.

1 9. My co-counsel and I will adequately represent the Class Members in this action.
2 Plaintiffs' Counsel have and will dutifully represent Plaintiffs and the Class and pursue this lawsuit to its
3 conclusion. I have no conflicts with the Class.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing is
5 true and correct. Executed this 3rd day of May 2026, at Los Angeles, California.

6 

7 _____
Larry W. Lee