

Timothy B. Del Castillo
Kent L. Bradbury
Castle Law
2999 Douglas Blvd., Suite 180
Roseville, California 95661
(916) 245-0122
tdc@castleemploymentlaw.com
kb@castleemploymentlaw.com

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
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
kagnew@diversitylaw.com

Attorneys for Plaintiff and the Class

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

LISA LEFANTY, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

KAISER FOUNDATION HOSPITALS;
DOES 1 to 20, inclusive,

Defendants.

Case No.: CV-21-004330

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

Date: March 4, 2025

Time: 8:30 a.m.

Dept.: 24

Action Filed: August 13, 2021

Trial Date: None Set

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

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

6 2. I am one of the primary attorneys on this matter. Based on my own independent
7 investigation and evaluation, I am of the opinion that settlement for the consideration and on the
8 terms set forth in the Class and Representative Action Settlement Agreement (“Agreement” or
9 “Settlement Agreement”) is fair, reasonable, and adequate and is in the best interests of the
10 Class, in light of all known facts and circumstances and the expenses and risks inherent in
11 litigation.

12 3. The funds represented by uncashed settlement checks will be paid out pursuant to
13 California Code of Civil Procedure section 384 to Legal Aid at Work, the designated *cy pres*
14 recipient. Neither I nor any members of my firm maintain an interest in and/or relationship with
15 the Lawyers’ Committee for Civil Rights.

16 4. My office was retained based upon a contingency fee arrangement wherein Class
17 Counsel agreed to advance all costs and receive no fee unless a recovery was accomplished.
18 Specifically, had Plaintiff failed to prevail in the matter, Class Counsel would have spent a
19 significant amount of time, money and other resources without any benefit or return. For
20 instance, my office has expended costs to file the instant action, effect service of process, pay
21 mediation fees and other litigation related costs. In addition, had Plaintiff also failed to prevail in
22 the present cases, Defendant would have been able to seek costs in connection with its defense of
23 the case.

24 5. Class Counsel are experienced and well-qualified class action litigators who have
25 litigated many wage and hour class actions and have each been certified as class counsel in
26 numerous other class actions, particularly wage and hour class actions.

27 6. My qualifications are as follows: I received my J.D. from Arizona State
28 University College of Law in 2003. During law school, I was a summer associate at the law firm

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

7 7. My firm's primary focus is employment law. I have handled a number of wage
8 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
9 encompasses cases throughout the State of California, including but not limited to the Los
10 Angeles Superior Court, Orange County Superior Court, San Francisco County Superior Court,
11 San Diego County Superior Court, and the United States District Courts for the Central, Eastern,
12 and Northern Districts of California.

13 8. I have been named as Class Counsel in a number of class actions that have been
14 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
15 Francisco County, and the United States District Court for the Central District of California,
16 including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
17 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
18 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
19 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
20 Judicial Council Coordination Proceeding No. 4480; and *Hernandez v. CVS Corp. et al.*, Judicial
21 Council Coordination Proceeding No. 4539.

22 9. My co-counsel and I will adequately represent the Class Members in this action.
23 Class Counsel has and will zealously represent Plaintiff and the Class and pursue this lawsuit to
24 its conclusion. I have no conflicts with the Class and will adequately represent the Class.
25
26
27
28

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

3 Executed on this 23rd day of January 2025, at Los Angeles, California.

4 
5 Larry W. Lee