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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

DOUGLAS WALKER, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

PEET'S COFFEE, INC., a Virginia corporation
limited liability company; and DOES 1 through
50, inclusive,

Defendants.

Case No. RG21095499

[Hon. Brad Seligman, Department 23]

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

Date: June 27, 2023
Time: 3:00 p.m.
Department: 23

Reservation ID: A-21095499-002

Complaint Filed: April 15, 2021

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 Plaintiff. I make this declaration on the basis of my
4 own personal knowledge, except as to those matters stated on information and belief and, as to those
5 matters, I believe them to be true. If called as a witness, I could testify competently as to the facts stated
6 in this declaration.

7 2. The Notice of Class Action Settlement (“Class Notice”) provided Class Members with
8 my office’s contact information, where they could further seek information regarding the class
9 settlement, leave questions for the Administrator, and update their address.

10 3. There were no objections to the amount of attorneys’ fees or litigation costs that Class
11 Counsel seek in this case and for which Plaintiff asks the Court for final approval.

12 4. Class Counsel engaged in extensive factual investigation before settling, including the
13 exchange of extensive informal discovery and class data. This allowed Plaintiff to conduct a full damage
14 analysis. The Agreement was the product of negotiation between highly able and experienced attorneys
15 on both sides who possessed the relevant data and extensive legal research which they had carefully
16 analyzed.

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

21 6. My firm has a great deal of experience in wage and hour class action litigation and has
22 been approved as class counsel in a number of class actions.

23 7. I am one of the primary attorneys on this matter. My qualifications are as follows: I
24 received my J.D. from Arizona State University College of Law in 2003. During law school, I was a
25 summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude from Arizona
26 State University College of Law in the top 10% of my class. While I was in law school, I was the
27 Associate Managing Editor of the Arizona State University College of Law, Law Journal. Upon
28 graduation, I practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash

1 Smoak & Stewart, P.C., a national employment defense law firm that represents a significant number of
2 Fortune 500 companies, including wage and hour class actions.

3 8. My firm's primary focus is employment law. I have handled a number of wage and hour
4 matters including class actions and individual actions, on both plaintiff and defense sides. I have a
5 practice that encompasses cases throughout the State of California, including but not limited to the Los
6 Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior
7 Courts, the San Diego County Superior Courts, and the United States District Courts for the Central,
8 Eastern, Northern, and Southern Districts of California. I have been named as Class Counsel in a
9 number of class actions that have been granted final approval by the Superior Courts of Los Angeles
10 County, Orange County, San Francisco County, Alameda County, Contra Costa County, Monterey
11 County, San Bernardino County, Santa Clara County, Sonoma County, and the United States District
12 Court for the Central, Eastern, and Northern Districts of California.

13 9. My firm has incurred costs in the amount of \$9,056.77. The costs are all litigation related
14 costs, including filing fees and mediation fees. Attached hereto as **Exhibit A** is copy of the costs my
15 firm has incurred in connection with prosecution of this lawsuit.

16 10. On March 21, 2023, Plaintiff uploaded the Order Granting Plaintiff's Motion for
17 Preliminary Approval of Class Action Settlement to the LWDA's website. Concurrent with the filing of
18 this motion, Plaintiff also has uploaded the final approval motion to the LWDA.

19 I declare under penalty of perjury under the laws of the State of California that the foregoing is
20 true and correct. Executed this 1st day of June 2023, at Los Angeles, California.

21 

22 _____
Larry W. Lee

EXHIBIT A

5/23/2023
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DIVERSITY LAW GROUP
Slip Listing

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Selection Criteria

Slip Classification Open
Client (hand select) Include: Walker, Douglas v. Peet's
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
66960	EXP	Erika Mejia	1	1447.00	1447.00
4/14/2021		Court fees			
WIP		Walker, Douglas v. Peet's			
Alameda Fax Filing - Complaint					
66922	EXP	Olympia	1	75.00	75.00
4/14/2021		Court fees			
WIP		Walker, Douglas v. Peet's			
LWDA					
67198	EXP	Olympia	1	67.99	67.99
4/26/2021		Atty Service			
WIP		Walker, Douglas v. Peet's			
Attorney Service - Complaint Service					
67294	EXP	Olympia	1	6.96	6.96
4/30/2021		Postage			
WIP		Walker, Douglas v. Peet's			
Postage					
67386	EXP	Erika Mejia	1	3.00	3.00
5/24/2021		Court fees			
WIP		Walker, Douglas v. Peet's			
Alameda Fax Filing - POS of Summons					
67446	EXP	Olympia	1	6.00	6.00
5/26/2021		Court fees			
WIP		Walker, Douglas v. Peet's			
Alameda Fax Filing - Notice of Minute Order					
67716	EXP	Olympia	5	0.25	1.25
5/31/2021		Photocopies			
WIP		Walker, Douglas v. Peet's			
Photocopies					
67717	EXP	Olympia	1	0.51	0.51
5/31/2021		Postage			
WIP		Walker, Douglas v. Peet's			
Postage					

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
67558 EXP 6/8/2021 WIP Alameda Fax Filing - FAC	Erika Mejia Court fees Walker, Douglas v. Peet's	1	9.00	9.00
67916 EXP 6/30/2021 WIP Postage	Olympia Postage Walker, Douglas v. Peet's	1	0.71	0.71
67915 EXP 6/30/2021 WIP Photocopies	Olympia Photocopies Walker, Douglas v. Peet's	8	0.25	2.00
68525 EXP 7/31/2021 WIP Photocopies	Olympia Photocopies Walker, Douglas v. Peet's	15	0.25	3.75
68526 EXP 7/31/2021 WIP Postage	Olympia Postage Walker, Douglas v. Peet's	1	1.40	1.40
71622 EXP 5/2/2022 WIP Louis Marlin Mediation	Olympia Arbitrators Walker, Douglas v. Peet's	1	7000.00	7000.00
72851 EXP 8/29/2022 WIP ACE E Filing - Status Report	Erika Mejia Court fees Walker, Douglas v. Peet's	1	16.85	16.85
73633 EXP 11/29/2022 WIP MPA Reservation	Olympia Court fees Walker, Douglas v. Peet's	1	1.00	1.00
73642 EXP 11/29/2022 WIP ACE E Filing - Status Report	Erika Mejia Court fees Walker, Douglas v. Peet's	1	16.85	16.85
74443 EXP 2/17/2023 WIP ACE E Filing - MPA	Erika Mejia Court fees Walker, Douglas v. Peet's	1	79.65	79.65

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
74678	EXP	Erika Mejia	1	17.85	17.85
3/13/2023		Court fees			
WIP		Walker, Douglas v. Peet's			
ACE E Filing - Supp SLY Decl					
75216	EXP	Simon Yang	1	300.00	300.00
5/23/2023		Court fees			
WIP		Walker, Douglas v. Peet's			
Filing Costs					
Grand Total					
			0.00		9056.77
			0.00		0.00
			0.00		9056.77