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Attorneys for Plaintiff and Aggrieved Employees

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

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

Plaintiff,

vs.

STANBRIDGE UNIVERSITY, a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 30-2021-01206298-CU-OE-CXC

(Assigned for all purposes to the Hon. William
Claster, Dept. CX 104)

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

Date: July 22, 2022

Time: 9:00 a.m.

Dept.: CX104

Reservation No.: 73787090

Complaint Filed: June 17, 2021

Trial Date: None

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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 California and am a member of the law firm of the Diversity Law Group, P.C., one of the attorneys of record for Plaintiff Matthew Miller (“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 thereto, I could and would competently do so.

2. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, I have concluded that 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 employment 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 multiple-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 Central, Eastern and Northern Districts of California.

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

9 6. To date, I have incurred approximately 2.7 hours in connection with the litigation of this
10 lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred to date.

11 7. The total lodestar for my hours will be approximately \$2,025.00 based on an hourly rate
12 of \$750.00 per hour. I have been approved at an hourly rate of \$750.00 per hour by various Courts,
13 including *Hernandez v. Wells Fargo Bank*, Santa Clara County Superior Court Case No. 16CV299319,
14 *Carrillo v. New Balance Athletics, Inc.*, Santa Clara County Superior Court Case No. 19CV352469;
15 *Ramirez v. Walgreen Co.*, United States District Court, Northern District of California Case No. 18-cv-
16 03921-EJD, *Chavez v. Converse, Inc.*, United States District Court, Northern District of California Case
17 No. 15-cv-03746-NC; *Foster v. Schindler Elevator Corporation*, Alameda County Superior Court Case
18 No. RG19029640; *Foaad Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No.
19 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No. BC720144;
20 *Mary Della Maggiora v. Watsonville Community Hospital*, Santa Cruz County Superior Court Case No.
21 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino County Superior Court Case
22 No.CIVDS1823132; *Michael Randolph v. Pacific Racing Association*, Alameda County Superior Court
23 Case No. RG18908139; *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court Case
24 No.19CV341582; *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-CU-OE-
25 VTA; *Carter v. Kline Services, Inc.*, San Bernardino Superior Court Case No. CIVDS1828867, and
26 *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara Superior Court Case No.
27 19CV345211.

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

3 Executed on this 21st day of June 2022, at Los Angeles, California.

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EXHIBIT A

Miller v. Stanbridge University
Time and Task Chart for Larry W. Lee

Hours	Description of Work
1.0	Edit mediation brief.
.6	Edit long form settlement agreement.
1.1	Edit Motion for Approval.
2.7	TOTAL HOURS