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

CHRISTIANE LANGE APPLGATE, as  
an individual and on behalf of all others  
similarly situated,

Plaintiff,

vs.

SEED BEAUTY, LLC, a California  
limited liability company; COLOUR POP  
DISC COMPANY, a California  
corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Lead Case No.: 56-2021-00555658-CU-OE-VTA  
(Consolidated with 56-2021-00556344-CU-OE-  
VTA & 56-2021-00560437-CU-OE-VTA)

(Assigned for all purposes to the Hon. Benjamin F.  
Coats, Department 43)

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

Date: April 3, 2024  
Time: 8:30 a.m.  
Dept.: 43

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I, Larry W. Lee, declare as follows:

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

2. From the inception of the case, Plaintiff's counsel have zealously represented the interests of the aggrieved employees. The settlement was obtained for the benefit of the aggrieved employees, as opposed to the individual Plaintiff.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the fairness of the settlement, which is based on factoring in the inherent risks in drawn-out litigation, as well as the possibility of appeals.

4. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, including the still-developing law under PAGA, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, I have concluded that settlement on the terms set forth in the Joint Stipulation of Settlement and Release of PAGA Claims (“Settlement Agreement” or “Settlement”) is appropriate and in the best interests of Plaintiff and the aggrieved employees.

5. 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.

6. My firm's primary focus is employment law. I have handled a number of wage and hour matters including class actions, multiple-plaintiff, and individual actions on both

1 plaintiff and defense sides. I have a practice that encompasses cases throughout the State of  
2 California, including but not limited to the Los Angeles Superior Courts, the Orange County  
3 Superior Courts, the San Francisco County Superior Courts, the San Diego County Superior  
4 Courts, and the United States District Courts for the Central, Eastern, Northern, and Southern  
5 Districts of California.

6 7. I have been named as class counsel in a number of class actions that have been  
7 granted final approval by the Superior Courts of Los Angeles County, Orange County, San  
8 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino  
9 County, Santa Clara County, Sonoma County, and the United States District Court for the  
10 Central, Eastern, and Northern Districts of California, including but not limited to the following  
11 class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-  
12 05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No.  
13 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx);  
14 *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial Council  
15 Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No.  
16 BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539;  
17 *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v.*  
18 *Community Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No.  
19 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court Judicial Council  
20 Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior  
21 Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court  
22 Case No. CV-18-558.

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

25 Executed on this 11<sup>th</sup> day of March 2024, at Los Angeles, California.

26  
27   
28 Larry W. Lee