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Attorneys for Plaintiff, the Class, and Aggrieved Employees

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

MELISSA MOSS, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

SARES REGIS OPERATING COMPANY,
L.P.; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 30-2021-01201041-CU-OE-CXC

[Assigned for all purposes to the Hon. William
Claster, in Department CX104]

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

Date: July 8, 2022

Time: 9:00 a.m.

Dept.: CX104

Reservation Number: 73780679

Complaint Filed: May 17, 2021

FAC Filed: August 16, 2021

SAC Filed: June 10, 2022

Trial Date: None Set

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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 Melissa Moss (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. Based on their own independent investigation and evaluation, the Parties and their respective counsel are of the opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (“Settlement Agreement”) is fair, reasonable, and adequate and is in the best interests of the Class and Defendant in light of all known facts and circumstances and the expenses and risks inherent in litigation.

3. I have spent significant time researching and pursuing the claims that have been alleged in this action. From the inception of the case, Class Counsel has zealously represented the interests of the Class. Class Counsel have engaged in significant meet and confer discussions with opposing counsel to obtain informal data and documents and to discuss the merits of the claims on behalf of the Class. This settlement was obtained for the benefit of the Class, as opposed to the individual Class Representative. Based on my review of all the documents and information, and based on my experience in class action litigation, I believe this settlement to be fair, adequate, and reasonable.

4. Plaintiff's Counsel does not have any relationship with or connection to Legal Aid Society of Orange County, the proposed *cy pres* beneficiary.

5. 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

1 of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm that
2 represents a significant number of Fortune 500 companies.

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

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

18 8. My co-counsel and I will adequately represent the Class Members in this action.
19 Plaintiff's Counsel have and will zealously represent Plaintiff and the Class and pursue this
20 lawsuit to its conclusion. I have no conflicts with the Class and will adequately represent the
21 Class.

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

24 Executed on this 10th day of June 2022, at Los Angeles, California.

25 

26 _____
Larry W. Lee