

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Nicholas Rosenthal (State Bar No. 268297)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

William L. Marder (State Bar No. 170131)
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
(831) 531-4214
(831) 634-0333 facsimile

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, Dept. CX104]

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

Date: May 5, 2023

Time: 9:00 a.m.

Dept.: CX104

Complaint Filed: May 17, 2021

FAC Filed: August 16, 2021

SAC Filed: June 21, 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 Virginia, and am with the law firm Diversity Law Group, counsel of record for Plaintiff [redacted] a Moss (“Plaintiff”). I have personal knowledge of the facts set forth below and if called by me I could and would do so competently.

2. I am one of the primary attorneys on this matter. The Joint Stipulation of Class and PAGA Settlement and Release of Claims (“Settlement Agreement”) was the product of negotiation between highly able and experienced attorneys. Class Counsel engaged in extensive factual investigation before settling, including reviewing class data and other information relevant to valuing this case. I support the settlement as fair, reasonable, and in the best interest of the Class Members as a whole.

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

5. I have been named as Class Counsel in a number of class actions that have been
final approval by the Superior Courts of Los Angeles County, Orange County, San

1 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
2 County, Santa Clara County, Sonoma County, and the United States District Court for the
3 Central, Eastern, and Northern Districts of California, including but not limited to the following
4 class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-
5 05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No.
6 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx);
7 *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial Council
8 Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No.
9 BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539;
10 *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v.*
11 *Community Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No.
12 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court Judicial Council
13 Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior
14 Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court
15 Case No. CV-18-558.

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

18 Executed on this 13th day of April 2023, at Los Angeles, California.

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