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County of Monterey
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Attorneys for Plaintiff, the Class, and Aggrieved Employees

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

SHARON MORRIS, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

COMMUNITY HOSPITAL OF THE
MONTEREY PENINSULA, a California
nonprofit corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 21CV001953

(Assigned to the Honorable Thomas W. Wills,
Dept. 15)

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

Date: May 13, 2022

Time: 8:30 a.m.

Dept.: 15

Complaint Filed: June 16, 2021

FAC Filed: August 6, 2021

SAC Filed: January 24, 2022

Trial Date: None Set

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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 Named Plaintiff Morris (“Plaintiff”). I have personal knowledge of the facts set forth below and if called upon I could and would do so competently.

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.

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 of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment

1 defense law firm that represents a significant number of Fortune 500 companies.

2 6. My firm's primary focus is employment law. I have handled a number of wage
3 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
4 encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the
5 San Francisco County Superior Courts, the San Diego County Superior Courts, and the United
6 States District Courts for the Central, Eastern and Northern Districts of California.

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

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

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

22 Executed on April 21, 2022, at Los Angeles, California.

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25 Larry W. Lee
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