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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

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

Plaintiff,

vs.

MISSION BAY MANAGEMENT, LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 37-2021-00035853-CU-OE-CTL

[Assigned for all purposes to the Honorable
Eddie C. Sturgeon, Dept. C-67]

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFF'S UNOPPOSED
EX PARTE APPLICATION RE: PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT APPROVAL**

Date: September 21, 2021

Time: 8:30 a.m.

Dept.: C-67

Complaint Filed: August 20, 2021

DECLARATION OF LARRY W. LEE

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, P.C., counsel of record for Plaintiff Chris Alvarado ("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 Plaintiff and 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, 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 Settlement Agreement 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.

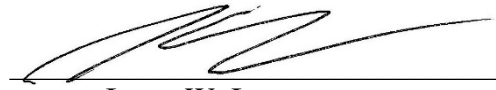
6. My primary practice is employment law. I have handled a number of wage and hour matters including class actions and individual actions, on both plaintiff and defense sides. I have a practice that encompasses cases in the Los Angeles Superior Courts, the Orange County

1 Superior Courts, the San Francisco County Superior Courts, the San Diego County Superior
2 Courts, and the United States District Courts for the Central, Northern, and Eastern Districts of
3 California. I have been named as Class Counsel in a number of class actions that have been
4 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
5 Francisco County, and the United States District Court for the Central District of California,
6 including the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
7 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
8 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
9 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court
10 Case No. JCCP 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC392717; and
11 *Hernandez v. CVS Corporation*, Los Angeles Superior Court Case No. JCCP 4539.

12 7. I understand that the attorneys' fees awarded in this action will be split 65% to
13 Diversity Law Group, P.C. and 35% to Polaris Law Group.

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

16 Executed on this September 16, 2021, at Los Angeles, California.

17 
18 Larry W. Lee