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Attorneys for Plaintiff and Aggrieved Employees

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

LORELEI CHAMBERS, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

SOMACIS INC., a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 37-2021-00033445-CU-OE-CTL

(Assigned to Hon. Eddie C. Sturgeon, Dept. C-67)

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

Date: November 18, 2022

Time: 9:00 a.m.

Dept.: C-67

Complaint Filed: August 5, 2021

Trial Date: None Set

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I, Larry W. Lee, declare as follows:

1. I am an attorney at law duly admitted to practice before all courts in the State of California and am a member of the law firm of the Diversity Law Group, P.C., one of the attorneys of record for Plaintiff Lorelei Chambers (“Plaintiff”) in the above-entitled action. I have personal knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I could and would competently do so.

2. 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 hereinafter set forth is appropriate and in the best interests of the Parties and that this settlement is fair and reasonable.

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

4. I have handled a number of wage and hour matters including class actions and multiple-plaintiff actions. I have a practice that encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior Courts, the San Diego County Superior Courts, 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 granted final approval by the Superior Courts of Los Angeles County, Orange County, San Francisco County, and the United States District Court for the Central District of California,

1 including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
2 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
3 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
4 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
5 Judicial Council Coordination Proceeding No. 4480; and *Hernandez v. CVS Corp. et al.*, Judicial
6 Council Coordination Proceeding No. 4539.

7 6. To date, I have incurred approximately 13.8 hours in connection with the
8 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred
9 to date.

10 7. I have been approved at an hourly rate of \$750.00 per hour by various Courts,
11 including *Hernandez v. Wells Fargo Bank*, Santa Clara County Superior Court Case No.
12 16CV299319, *Carrillo v. New Balance Athletics, Inc.*, Santa Clara County Superior Court Case
13 No. 19CV352469; *Ramirez v. Walgreen Co.*, United States District Court, Northern District of
14 California Case No. 18-cv-03921-EJD, *Chavez v. Converse, Inc.*, United States District Court,
15 Northern District of California Case No. 15-cv-03746-NC; *Foster v. Schindler Elevator*
16 *Corporation*, Alameda County Superior Court Case No. RG19029640; *Foaad Hanna v. Equinix,*
17 *LLC*, Santa Clara County Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*,
18 Los Angeles County Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville*
19 *Community Hospital*, Santa Cruz County Superior Court Case No. 18CV00191; *Pittman v.*
20 *Martinez Steel Corporation*, San Bernardino County Superior Court Case No. CIVDS1823132;
21 *Michael Randolph v. Pacific Racing Association*, Alameda County Superior Court Case No.
22 RG18908139; *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court Case
23 No. 19CV341582; *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-
24 CU-OE-VTA; *Carter v. Kline Services, Inc.*, San Bernardino Superior Court Case No.
25 CIVDS1828867, and *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa
26 Clara Superior Court Case No. 19CV345211.

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

Executed on this 17th day of May 2022, at Los Angeles, California.


Larry W. Lee

EXHIBIT A

Chambers v. Somacis Inc.
Time and Task Chart for Larry W. Lee

Hours	Description of Work
.4	Review and edit Complaint.
3.8	Review and edit mediation brief.
5.0	Review and edit settlement agreement.
4.6	Review and edit approval motion.
13.8	TOTAL HOURS