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Attorneys for Plaintiff and the Class

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

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

Plaintiff,

vs.

AIR TRANSPORT INTERNATIONAL, INC., a
Delaware corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 34-2021-00307289

[Assigned for all purposes to Department 25,
Hon. Jill H. Talley]

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

Date: January 6, 2023
Time: 9:00 a.m.
Department: 25

Complaint Filed: September 1, 2021

1 I, Larry W. Lee, declare as follows:

2 1. I am an attorney admitted to practice in the State of California and, with the law firm
3 Diversity Law Group, P.C., am counsel of record for Plaintiff. I make this declaration on the basis of my
4 own personal knowledge, except as to those matters stated on information and belief and, as to those
5 matters, I believe them to be true. If called as a witness, I could testify competently as to the facts stated
6 in this declaration.

7 2. The Notice of Class Action and PAGA Settlement (“Class Notice”) provided Class
8 Members with my office’s contact information, where they could further seek information regarding the
9 class settlement, leave questions for the Administrator, and update their address.

10 3. There were no objections to the amount of attorneys’ fees or litigation costs that Class
11 Counsel seek in this case and for which Plaintiff asks the Court for final approval.

12 4. Class Counsel engaged in extensive factual investigation before settling, including the
13 exchange of informal discovery and class data. This allowed Plaintiff to conduct a full damage analysis.
14 The Agreement was the product of negotiation between highly able and experienced attorneys on both
15 sides who possessed the relevant data and extensive legal research which they had carefully analyzed.

16 5. The settlement in the case at bar warrants approval and carries a presumption of fairness.
17 As previously noted in the application for Preliminary Approval, this current settlement was negotiated
18 at arm’s length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the
19 Class Members as a whole.

20 6. My firm has a great deal of experience in wage and hour class action litigation and has
21 been approved as class counsel in a number of class actions.

22 7. I am one of the primary attorneys on this matter. My qualifications are as follows: I
23 received my J.D. from Arizona State University College of Law in 2003. During law school, I was a
24 summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude from Arizona
25 State University College of Law in the top 10% of my class. While I was in law school, I was the
26 Associate Managing Editor of the Arizona State University College of Law, Law Journal. Upon
27 graduation, I practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash
28

1 Smoak & Stewart, P.C., a national employment defense law firm that represents a significant number of
2 Fortune 500 companies, including wage and hour class actions.

3 8. My firm's primary focus is employment law. I have handled a number of wage and hour
4 matters including class actions and individual actions, on both plaintiff and defense sides. I have a
5 practice that encompasses cases throughout the State of California, including but not limited to the Los
6 Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior
7 Courts, the San Diego County Superior Courts, and the United States District Courts for the Central,
8 Eastern, Northern, and Southern Districts of California. I have been named as Class Counsel in a
9 number of class actions that have been granted final approval by the Superior Courts of Los Angeles
10 County, Orange County, San Francisco County, Alameda County, Contra Costa County, Monterey
11 County, San Bernardino County, Santa Clara County, Sonoma County, and the United States District
12 Court for the Central, Eastern, and Northern Districts of California.

13 9. My firm has incurred costs in the amount of \$3,805.46. The costs are all litigation related
14 costs, including filing fees and mediation fees. Attached hereto as **Exhibit A** is copy of the costs my
15 firm has incurred in connection with prosecution of this lawsuit.

16 10. On September 15, 2022, Plaintiff uploaded the Order Granting Plaintiff's Motion for
17 Preliminary Approval of Class Action Settlement to the LWDA's website. Concurrent with the filing of
18 this motion, Plaintiff also has uploaded the final approval motion to the LWDA.

19 I declare under penalty of perjury under the laws of the State of California that the foregoing is
20 true and correct. Executed this 13th day of December 2022, at Los Angeles, California.

21 

22 _____
Larry W. Lee

EXHIBIT A

Selection Criteria

Client (hand select) Include: Velasquez, Rene v. Air CA
Slip.Transaction Ty 2 - 2
Slip.Classification Open
Client (hand select) Include: Velasquez, Rene v. Air CA
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description		Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
68250 7/29/2021 WIP LWDA	EXP	Olympia Court fees Velasquez, Rene v. Air CA	1	75.00	75.00
68522 7/31/2021 WIP Photocopies	EXP	Olympia Photocopies Velasquez, Rene v. Air CA	1	0.25	0.25
68523 7/31/2021 WIP Postage	EXP	Olympia Postage Velasquez, Rene v. Air CA	1	6.96	6.96
69131 9/1/2021 WIP Attorney Service - Complaint	EXP	Erika Mejia Atty Service Velasquez, Rene v. Air CA	1	1635.45	1635.45
69576 10/7/2021 WIP Attorney Service - Complaint Service	EXP	Christine Choo Atty Service Velasquez, Rene v. Air CA	1	43.50	43.50
69596 10/18/2021 WIP Attorney Service - POS of Summons	EXP	Christine Choo Atty Service Velasquez, Rene v. Air CA	1	53.45	53.45
70293 12/3/2021 WIP Attorney Service - Notice of CMC	EXP	Olympia Atty Service Velasquez, Rene v. Air CA	1	61.21	61.21

12/2/2022
6:01 PM

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Slip Listing

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
71017 EXP 2/7/2022 WIP Attorney Service - FAC	Olympia Atty Service Velasquez, Rene v. Air CA	1	57.21	57.21
71404 EXP 3/29/2022 WIP Attorney Service - Notice	Valeria Tril Atty Service Velasquez, Rene v. Air CA	1	59.71	59.71
71682 EXP 4/13/2022 WIP Attorney Service - Notice of Min Order	Valeria Tril Atty Service Velasquez, Rene v. Air CA	1	59.21	59.21
71685 EXP 4/14/2022 WIP Attorney Service - MPA	Erika Mejia Atty Service Velasquez, Rene v. Air CA	1	249.27	249.27
72971 EXP 8/17/2022 WIP Attorney Service - MPA	Erika Mejia Atty Service Velasquez, Rene v. Air CA	1	195.21	195.21
72928 EXP 9/12/2022 WIP Online Sac Order	Erika Mejia Online researc Velasquez, Rene v. Air CA	1	4.00	4.00
73659 EXP 12/2/2022 WIP Final Costs	Olympia Court fees Velasquez, Rene v. Air CA	1	500.00	500.00
Grand Total	Billable Unbillable Total	0.00 0.00 0.00		3000.43 0.00 3000.43

12/2/2022
6:01 PM

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Slip Listing

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Selection Criteria

Slip Classification Open
Client (hand select) Include: Velasquez, Rene v. Air PAGA
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
69563	EXP	Christine Choo	1	565.59	565.59
10/1/2021		Atty Service			
WIP		Velasquez, Rene v. Air PAGA			
Attorney Service - Complaint					
69575	EXP	Christine Choo	1	67.99	67.99
10/7/2021		Atty Service			
WIP		Velasquez, Rene v. Air PAGA			
Attorney Service - Complaint Service					
69595	EXP	Christine Choo	1	53.45	53.45
10/18/2021		Atty Service			
WIP		Velasquez, Rene v. Air PAGA			
Attorney Service - POS of Summons					
70399	EXP	Olympia	10	0.25	2.50
12/31/2021		Photocopies			
WIP		Velasquez, Rene v. Air PAGA			
Photocopies					
70400	EXP	Olympia	1	0.73	0.73
12/31/2021		Postage			
WIP		Velasquez, Rene v. Air PAGA			
Postage					
71353	EXP	Erika Mejia	1	114.77	114.77
3/3/2022		Atty Service			
WIP		Velasquez, Rene v. Air PAGA			
Attorney Service - Stip					
Grand Total					
			0.00		805.03
			0.00		0.00
			0.00		805.03