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Attorneys for Plaintiffs and the Class
(Additional Counsel on Next Page)

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

MATTHEW WILLIAMS, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

PALAMERICAN SECURITY (CALIFORNIA)
INC., a Delaware corporation; PALAMERICAN
SECURITY, INC., a Tennessee corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 34-2021-00305148-CU-OE-GDS

[Assigned to the Hon. Jill H. Talley, Dept. 27]

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

Date: August 18, 2023
Time: 9:00 a.m.
Dept.: 27

Action Filed: July 29, 2021

Reservation No. A-305148-00

NATHANIAL SINCLAIRE, on behalf of
himself and all others similarly situated, and on
behalf of the general public,

Plaintiff,

vs.

PALAMERICAN SECURITY (CALIFORNIA)
INC., a Delaware Corporation and DOES 1
through 10, inclusive,

Defendants.

Case No. 34-2021-00312335

Action Filed: December 8, 2021

ADDITIONAL COUNSEL

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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 California, and am with the law firm Diversity Law Group, P.C., counsel of record for Named Plaintiff Brenda Williams, Successor of Interest of Decedent Matthew Williams (hereinafter referred to as “Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. Based on their own independent investigations and evaluations, the Parties and their respective counsel are of the opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class Action Settlement and Release (“Agreement”) are fair, reasonable, and adequate and is in the best interests of the Class and Defendants in light of all known facts and circumstances and the expenses and risks inherent in litigation.

3. Both Plaintiff's and Defendant's counsel have a great deal of experience in wage and hour class action litigation. Furthermore, counsel for Plaintiff is an experienced team of lawyers with substantial complex litigation experience. Plaintiff's counsel has been approved as class counsel in other wage/hour class actions, including in this case.

4. 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.

5. 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 encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the

1 San Francisco County Superior Courts, the San Diego County Superior Courts, and the United
2 States District Courts for the Central, Eastern and Northern Districts of California.

3 6. 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 Judicial Council Coordination Proceeding No. 4480; and *Hernandez v. CVS Corp. et al.*, Judicial
11 Council Coordination Proceeding No. 4539 .

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13 I declare under penalty of perjury that the foregoing is true and correct. Executed on July
14 26, 2023 at Los Angeles, California.

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