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Attorneys for Plaintiff and the Class

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

ANTONIO JESUS JARAMILLO DE LA CRUZ,
as an individual and on behalf of all others
similarly situated, and as a private attorney
general,

Plaintiff,

vs.

WEIDNER PROPERTY MANAGEMENT, LLC,
a Washington limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 34-2021-00308697

[Assigned for all purposes to Department 22,
Hon. Lauri A. Damrell]

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

Date: February 16, 2024
Time: 9:00 a.m.
Department: 22

Complaint Filed: September 22, 2021
FAC Filed: February 28, 2022

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 Settlement (“Class Notice”) provided Class Members with
8 my office’s contact information, where they could further seek information regarding the class
9 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 \$5,181.97. The costs are all litigation related
14 costs, including filing fees. Attached hereto as **Exhibit A** is copy of the costs my firm has incurred in
15 connection with prosecution of the claims alleged in this lawsuit.

16 10. Plaintiff uploaded the Order Granting Plaintiff's Motion for Preliminary Approval of
17 Class Action Settlement to the LWDA's website. Concurrent with the filing of this motion, Plaintiff also
18 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 22nd day of January 2024, at Los Angeles, California.

21 

22 _____
Larry W. Lee

EXHIBIT A

1/18/2024
4:59 PM

DIVERSITY LAW GROUP
Slip Listing

Page 1

Selection Criteria

Slip Classification Open
Client (hand select) Include: Jaramillo v. Weidner CA
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		
68129	EXP	Linda Lee	1	75.00	75.00
7/15/2021		Court fees			
WIP		Jaramillo v. Weidner CA			
LWDA					
68472	EXP	Olympia	1	6.96	6.96
7/31/2021		Postage			
WIP		Jaramillo v. Weidner CA			
Postage					
68661	EXP	Olympia	1	43.50	43.50
8/31/2021		Online researc			
WIP		Jaramillo v. Weidner CA			
Online Decl of Martin Sullivan					
69168	EXP	Olympia	1	1640.45	1640.45
9/22/2021		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - Complaint					
69651	EXP	Olympia	24	0.25	6.00
10/31/2021		Photocopies			
WIP		Jaramillo v. Weidner CA			
Photocopies					
69652	EXP	Olympia	1	2.29	2.29
10/31/2021		Postage			
WIP		Jaramillo v. Weidner CA			
Postage					
70600	EXP	Olympia	1	57.21	57.21
1/18/2022		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - POS					
70606	EXP	Olympia	1	61.71	61.71
1/19/2022		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - Notice					

1/18/2024
4:59 PM

DIVERSITY LAW GROUP
Slip Listing

Page 2

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		
70623	EXP	Olympia	1	56.21	56.21
1/25/2022		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - Notice					
70837	EXP	Olympia	6	0.25	1.50
1/31/2022		Photocopies			
WIP		Jaramillo v. Weidner CA			
Photocopies					
70838	EXP	Olympia	1	1.21	1.21
1/31/2022		Postage			
WIP		Jaramillo v. Weidner CA			
Postage					
71397	EXP	Linda Lee	1	72.46	72.46
3/24/2022		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - Joint Stip re FAC					
71456	EXP	Olympia	1	2.56	2.56
3/31/2022		Postage			
WIP		Jaramillo v. Weidner CA			
Postage					
72145	EXP	Erika Mejia	1	112.92	112.92
5/9/2022		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - FAC					
72045	EXP	Olympia	9	0.25	2.25
5/31/2022		Photocopies			
WIP		Jaramillo v. Weidner CA			
Photocopies					
72046	EXP	Olympia	1	0.73	0.73
5/31/2022		Postage			
WIP		Jaramillo v. Weidner CA			
Postage					
75846	EXP	Erika Mejia	1	203.74	203.74
7/11/2023		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - MPA					
75850	EXP	Erika Mejia	1	62.74	62.74
7/13/2023		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - Amended Prop Order					

1/18/2024
4:59 PM

DIVERSITY LAW GROUP
Slip Listing

Page 3

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		
75852	EXP	Erika Mejia	1	83.74	83.74
7/14/2023		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - Notice of Errata					
76308	EXP	Erika Mejia	1	73.24	73.24
9/20/2023		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - Supp Decl					
76581	EXP	Erika Mejia	1	98.99	98.99
10/23/2023		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - Revised Prop Order					
76595	EXP	Olympia	1	67.24	67.24
10/30/2023		Atty Service			
WIP		Jaramillo v. Weidner CA			
Attorney Service - Notice of Min Order					
77247	EXP	Simon Yang	1	300.00	300.00
1/18/2024		Court fees			
WIP		Jaramillo v. Weidner CA			
Est Fees					
Grand Total					
			Billable	0.00	3032.65
			Unbillable	0.00	0.00
			Total	0.00	3032.65

1/18/2024
2:37 PM

DIVERSITY LAW GROUP
Slip Listing

Page 1

Selection Criteria

Slip Classification Open
Client (hand select) Include: Jaramillo v. Weidner 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		
69166	EXP	Olympia	1	1667.59	1667.59
9/21/2021		Atty Service			
WIP		Jaramillo v. Weidner PAGA			
Attorney Service - Complaint					
69653	EXP	Olympia	17	0.25	4.25
10/31/2021		Photocopies			
WIP		Jaramillo v. Weidner PAGA			
Photocopies					
69654	EXP	Olympia	1	2.29	2.29
10/31/2021		Postage			
WIP		Jaramillo v. Weidner PAGA			
Postage					
70601	EXP	Olympia	1	57.21	57.21
1/18/2022		Atty Service			
WIP		Jaramillo v. Weidner PAGA			
Attorney Service - POS					
70607	EXP	Olympia	1	61.71	61.71
1/19/2022		Atty Service			
WIP		Jaramillo v. Weidner PAGA			
Attorney Service - Notice					
71081	EXP	Olympia	1	198.54	198.54
2/28/2022		Atty Service			
WIP		Jaramillo v. Weidner PAGA			
Attorney Service - Joint Stip					
71157	EXP	Olympia	1	2.56	2.56
2/28/2022		Postage			
WIP		Jaramillo v. Weidner PAGA			
Postage					
71398	EXP	Linda Lee	1	73.46	73.46
3/24/2022		Atty Service			
WIP		Jaramillo v. Weidner PAGA			
Attorney Service - Joint Stip re FAC					

1/18/2024
2:37 PM

DIVERSITY LAW GROUP
Slip Listing

Page 2

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		
71402	EXP	Erika Mejia	1	81.71	81.71
3/28/2022		Atty Service			
WIP		Jaramillo v. Weidner PAGA			
Attorney Service - Stip					
Grand Total					
			Billable	0.00	2149.32
			Unbillable	0.00	0.00
			Total	0.00	2149.32