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Attorneys for Plaintiff and the Aggrieved Employees

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

PORSCHA LE AI, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

PROGRESSIVE CASUALTY
INSURANCE COMPANY, an Ohio
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 34-2021-00308276-CU-OE-GDS

(Assigned to the Honorable Lauri A. Damrell, Dept.
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**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFF'S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: February 17, 2023

Time: 9:00 a.m.

Dept.: 28

Reservation No.: 2697723

Complaint Filed: September 20, 2021

FAC Filed: January 7, 2022

SAC Filed: December 15, 2022

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
 2. nia and am a member of the law firm of the Diversity Law Group, P.C., one of the
 3. ys of record for Plaintiff Porscha Le Ai (“Plaintiff”) in the above-entitled action. I have
 4. al knowledge of the matters set forth herein, and if called upon as a witness to testify
 5. I could and would competently do so.

2. After taking into account sharply disputed factual and legal issues involved in this case, the risks attending further prosecution, and the substantial benefits to be received from 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 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 Journal. Upon graduation, I practiced law as an associate at the Los Angeles offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment 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 e-plaintiff actions. I have a practice that encompasses cases throughout the State of California, including but not limited to Los Angeles Superior Court, Orange County Superior Court, San Diego County Superior Courts, Santa Clara County Superior Court, and the United States District Courts for the Central, Northern, and Eastern Districts of California.

5. I have been named as Class Counsel in a number of class actions that have been given final approval by the Superior Courts of Los Angeles County, Orange County, San Diego County, and the United States District Court for the Central District of California,

1 including but not limited to the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San
2 Francisco Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*,
3 Orange County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of
4 California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange
5 County Superior Court, Judicial Council Coordination Proceeding No. 4480; and *Hernandez v.*
6 *CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539.

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

9 Executed on this 20th day of January 2023, at Los Angeles, California.

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