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Attorneys for Plaintiff and the Class

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

DEWEY ANDERSON, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

GRAHAM PACKAGING PET
TECHNOLOGIES, INC., a Delaware
corporation; and DOES 1 through 50,
inclusive,

Defendant.

Case No.: CV-21-005550

(Assigned to the Hon. Sonny S. Sandhu, Dept. 24)

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

Date: March 29, 2023

Time: 8:30 a.m.

Dept.: 24

Complaint Filed: October 8, 2021

FAC Filed: February 8, 2022

Trial Date: Not Set

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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 Plaintiff Dewey Anderson (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Plaintiff's Counsel have zealously represented the interests of Plaintiff and the Aggrieved Employees.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the fairness of the settlement. 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 set forth in the PAGA Settlement Agreement (“Settlement Agreement”) is appropriate and in the best interests of Plaintiff and the Aggrieved Employees.

4. My qualifications are as follows: I received my JD 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.

5. For more than one and a half years 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 50 companies, including many actions involving wage and hour matters.

6. My primary practice is employment law. I have handled a number of wage and hour matters including class actions and individual actions, on both plaintiff and defense sides. I have a practice that encompasses cases throughout the State of California, including but not limited to 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

1 District Courts for the Central, Eastern, Northern, and Southern Districts of California. I have
2 been named as Class Counsel in a number of class actions that have been granted final approval
3 by the Superior Courts of Los Angeles County, Orange County, San Francisco County, Alameda
4 County, Contra Costa County, Monterey County, San Bernardino County, Santa Clara County,
5 Sonoma County, and the United States District Court for the Central, Eastern, and Northern
6 Districts of California, including but not limited to the following class actions: *Chan Lanier v.*
7 *Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic*
8 *Home Loans et al.*, Orange County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central
9 District of California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime*
10 *Cases*, Orange County Superior Court, Judicial Council Coordination Proceeding No. 4480; *Tse*
11 *v. Best Buy*, Los Angeles Superior Court Case No. BC392717; *Hernandez v. CVS Corp. et al.*,
12 Judicial Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County
13 Superior Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey*
14 *Peninsula*, Monterey County Superior Court Case No. 17CV003452; *DirecTv Wage and Hour*
15 *Cases*, Santa Clara Superior Court Judicial Council Coordination Proceeding No. 4850; *Perez v.*
16 *Standard Drywall, Inc.*, Alameda County Superior Court Case No. RG15761142; and *Davis v.*
17 *Nugget Market, Inc.*, Yolo County Superior Court Case No. CV-18-558.

18 7. I have been approved as class counsel in numerous other wage/hour class actions
19 that have been granted class certification and final approval.

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

22 Executed on this 7th day of March 2023, at Los Angeles, California.

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25 Larry W. Lee
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