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Superior Court of California
County of Stanislaus
Hugh K. Swift
Clerk of the Court
By: Omar Fernandez, Deputy

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

ERIC ROMAN, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SUNOPTA GRAINS AND FOODS INC.,
a Minnesota corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CV-21-005589

[Assigned to the Hon. Clifford Tong, Dept. 23]

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

Date: September 1, 2026
Time: 8:30 a.m.
Dept.: 23

Action Filed: October 12, 2021
Trial Date: N/A

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DECLARATION OF LARRY W. LEE

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, counsel of record for Plaintiff Eric Roman ("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 interest of Plaintiff and the aggrieved employees. The settlement was obtained for the benefit of the aggrieved employees, as opposed to the individual Plaintiff.

3. I strongly believe that Plaintiff can prevail at trial. However, after taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, including the still-developing law under PAGA, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, as well as the possibility of appeals, I have concluded that settlement on the terms set forth in the PAGA Settlement Agreement is appropriate and in the best interests of Plaintiff and the aggrieved employees.

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, Northern, and Southern 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, Alameda County, Contra Costa County, Monterey County, San Bernardino
6 County, Santa Clara County, Sonoma County, and the United States District Court for the
7 Central, Eastern, and Northern Districts of California, including but not limited to the following
8 class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-
9 05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No.
10 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx);
11 *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial Council
12 Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No.
13 BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539;
14 *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v.*
15 *Community Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No.
16 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court Judicial Council
17 Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior
18 Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court
19 Case No. CV-18-558.
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21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct.

23 Executed on this 9th day of June 2026, at Los Angeles, California.

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26 _____
27 Larry W. Lee
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