

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com
kagnew@diversitylaw.com

Attorneys for Plaintiffs Tamara Suvorova and Andy Echeverria Palomo

POTTER HANDY LLP
Mark D. Potter (SBN 166317)
mark@potterhandy.com
James M. Treglio (SBN 228077)
jimt@potterhandy.com
100 Pine St., Ste 1250
San Francisco, CA 94111
(858) 375-7385
Fax: (888) 422-5191

Attorneys for Plaintiff David Scott

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

TAMARA SUVOROVA, as an individual
and on behalf of all others similarly
situated; ANDY ECHEVERRIA
PALOMO, as an individual and on behalf
of all others similarly situated,

Plaintiffs,

vs.

VKS MURRIETA LIMITED
PARTNERSHIP, et al.,

Defendants.

Case No.: CIVSB2203870

(Assigned for all purposes to the Hon. Joseph T.
Ortiz, Dept. S17)

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

Date: May 16, 2024

Time: 1:30 P.M.

Dept.: S-17

Action Filed: February 17, 2022

Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

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 Plaintiffs Maria Suvorova and Andy Echeverria Palomo (together, "Plaintiffs"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so truthfully.

3. 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. I have been named as class counsel in a number of class actions that have been

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

17 6. My co-counsel and I will adequately represent the Class Members in this action.
18 Plaintiffs' counsel have and will zealously represent Plaintiffs and the Class and pursue this
19 lawsuit to its conclusion.

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 24th day of April 2024, at Los Angeles, California.

23
24 
25 _____
26 Larry W. Lee
27
28