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Attorneys for Plaintiff and the Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

LEYLA SHAMS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

REVATURE LLC, a Virginia corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 22CV394270

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

Date: June 4, 2025

Time: 1:30 p.m.

Dept.: 19

Action Filed: February 14, 2022

Trial Date: None Set

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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 Leyla ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I and would do so competently.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the fairness of the settlement, which is based on factoring in the inherent risks in drawn-out litigation, as well as the possibility of appeals.

5. I do not have a relationship with the *cy pres* recipient, the Justice Gap Fund.

7. 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

1 have a practice that encompasses cases throughout the State of California, including but not
2 limited to the Los Angeles Superior Courts, the Orange County Superior Courts, the San
3 Francisco County Superior Courts, the San Diego County Superior Courts, and the United States
4 District Courts for the Central, Eastern, Northern, and Southern Districts of California.

5 8. I have been named as class counsel in a number of class actions that have been
6 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
7 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
8 County, Santa Clara County, Sonoma County, and the United States District Court for the
9 Central, Eastern, and Northern Districts of California, including but not limited to the following
10 class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-
11 05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No.
12 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx);
13 *Universal Protection Overtime Cases*, Orange County Superior Court Case No. JCCP 4480; *Tse*
14 *v. Best Buy*, Los Angeles Superior Court Case No. BC392717; and *Hernandez v. CVS*
15 *Corporation*, Los Angeles Superior Court Case No. JCCP 4539.

16 9. To date, I have incurred approximately 16.8 hours in connection with the
17 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred
18 to date. I anticipate spending approximately another 5 hours on post-approval matters like
19 responding to aggrieved employees and engaging with the settlement administrator.

20 10. The total lodestar for my hours will be approximately \$19,620.00 based on an
21 hourly rate of \$900.00 per hour.

22 11. I was approved at \$900 per hour in *Abernathy v. Deacon Construction, LLC*,
23 Santa Clara County Superior Court Case No. 20CV367327 (February 10, 2025) and
24 *Middlebrooks v Fleetpride, Inc.*, Shasta County Superior Court Case No. 23CV-0202247. Prior
25 to that, I was approved at an hourly rate of \$800.00 per hour in *Martinez and Acosta v. City of*
26 *Hope National Medical Center, et al.*, San Bernardino County Superior Court Case No.
27 CIVDS2015729; *Jaime Moen v. Genentech, Inc.*, San Diego County Superior Court Case No.
28 37-2021-00008619-CU-OE-CTL; *Murray v. Granite Wellness Centers et al.*, Nevada County

1 Superior Court Case No. CU20-084680; *Smith, et al. v. Clean Harbors Environmental Services,*
2 *Inc.*, Sacramento County Superior Court Case No. 34-2021-00292526; *Correa et al. v. FedEx*
3 *Supply Chain, Inc.*, San Bernardino County Superior Court Case No. CIVDS2023369; *Meguro v.*
4 *Silicon Valley Bank*, Santa Clara County Superior Court Case No. 20CV369854; *Linaki v. Genji*
5 *Pacific, LLC*, Alameda County Superior Court Case No. RG20074795; and *Robert Jordan v.*
6 *Mondelez Global, LLC*, San Bernardino County Superior Court Case No. CIVSB2202758I have
7 been approved at \$850.00 per hour in *Stephenson v. Healthcare Services, Inc.*, Orange County
8 Superior Court Case No. 30-2019-01078609-CU-OE-CXC, *Lakey v. Poshmark, Inc.*, Santa Clara
9 Superior Court, Case No. 22CV395084; *Audycki v. Stanford Health Care*, Santa Clara Case No.
10 19CV347173; *Palomino v. Northrop Grumman Systems Corporation*, Santa Clara Superior
11 Court Case No. 19CV345534; *Lakey v. Poshmark, Inc.*, Santa Clara Superior Court, Case No.
12 22CV395084; *Stephenson v. Healthcare Services, Inc.*, Orange County Superior Court Case No.
13 30-2019-01078609-CU-OE-CXC; and *Medina v. United Airlines, Inc.*, Los Angeles Superior
14 Court, Case No. BC624742.

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

17 Executed on this 12th day of May 2025, at Los Angeles, California.

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EXHIBIT A

Shams v. Revature LLC
Time and Task Chart for Larry W. Lee

Hours	Description of Work
1.1	Review and edit complaint.
1.0	Confer with co-counsel re whether remand appropriate; conduct legal research re same.
4.7	Review and revise opposition to motion to compel arbitration; confer with co-counsel re same; analyze and review Defendant's motion re same.
.5	Review and revise demand for arbitration.
1.5	Review and revise written discovery; review Defendant's responses re same.
3.4	Review data and policies informally produced by Defendant and perform damages calculation for second mediation.
1.2	Review and edit mediation briefs.
1.5	Review and edit long-form settlement agreement.
1.9	Review and edit motion for approval of PAGA settlement and accompanying documents.
16.8	<u>TOTAL</u>