

B. James Fitzpatrick (SBN: 129056)
Alison L. Baker (SBN: 193601)
Laura L. Franklin (SBN: 282642)
FITZPATRICK & SWANSTON
555 S. Main Street
Salinas, CA 93901
Telephone: (831) 755-1311
Facsimile: (831) 755-1319

Howard L. Magee (State Bar No. 185199)
Larry W. Lee (State Bar No. 228175)
Max W. Gavron (State Bar No. 291697)
Christine S. Lee (State Bar No. 339947)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
hmagee@diversitylaw.com
lwlee@diversitylaw.com
mgavron@diversitylaw.com
christine@diversitylaw.com

Attorneys for Plaintiffs
RYAN CHANLEY, OLIVIER LARA, VERONICA MEDINA, and CELIA OROZCO on
behalf of themselves and all similarly situated employees

SUPERIOR COURT OF CALIFORNIA
COUNTY OF MONTEREY

RYAN CHANLEY on behalf of himself
and all similarly situated employees

Plaintiff,

vs.

GROWERS TRANSPLANTING, INC., a
California corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No. 22CV002837

(Assigned to the Honorable Thomas W. Wills,
Dept. 15)

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

Date: March 22, 2024

Time: 8:30 a.m.

Dept: 15

Action Filed: September 22, 2022

Trial Date: Not Set

DECLARATION OF CHRISTINE S. LEE

I, Christine S. 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 Plaintiffs Ryan Chanley, Olivier Lara, Veronica Medina, and Celia Orozco (together, "Plaintiffs"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. Based on my own independent investigation and evaluation, I am of opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class Action and PAGA Settlement ("Settlement Agreement") are fair, reasonable, and adequate and is in the best interests of the Class in light of all known facts and circumstances and the expenses and risks inherent in litigation.

3. I strongly believe that Plaintiffs can prevail at trial. However, I also believe in the fairness of the settlement, which is based on factoring in the uncertainty and risks to Plaintiffs involved in not prevailing on one or more of the causes of action or theories alleged in the operative First Amended Complaint and in the possibility of appeals.

4. 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 believe this settlement to be fair, adequate, and reasonable.

5. I am one of the attorneys on this matter. My qualifications are as follows: Prior to attending law school, I had approximately 5 years of experience as a Litigation Paralegal. During law school, I was a Legal Intern for the U.S. Department of Veterans Affairs, a Judicial Intern for the Honorable James A. Bonifant of the Circuit Court for Montgomery County, and a Summer Associate for the Law Firm of Paley Rothman. I was also a Law Clerk for the Law Offices of Choi and Associates until I began my employment at Diversity Law Group, P.C. I received my JD from University of Baltimore in 2021. Upon graduation from law school, I was admitted to the California Bar in 2021.

1 6. I am currently an associate at the law firm Diversity Law Group, P.C., an
2 employment law firm that has handled numerous wage and hour class and individual actions,
3 on both plaintiff and defense sides. The firm currently has cases in Alameda Superior Court,
4 San Diego Superior Court, Santa Clara Superior Court, Sacramento Superior Court, Alameda
5 Superior Court, Monterey Superior Court, San Francisco Superior Court, San Joaquin Superior
6 Court, Kern County Superior Court, San Bernardino Superior Court, and the United States
7 District Courts for the Central, Northern, and Eastern Districts of California.

8 7. I am currently handling numerous wage and hour class action and PAGA
9 lawsuits, including *Marin v. Sea World LLC* (Case Number 37-2021-00047859-CU-OE-CTL,
10 Case Number Case Number 37-2022-00001083-CU-OE-CTL); *Marin v. HB Leisure, Inc.*
11 (Lead Case Number 37-2021-00048225-CU-OE-CTL); *McFarland v. Helix Electric, Inc.*
12 (Case Number 21CV391268, Case Number 22CV394399); *Ford v. The Silver F, Inc.* (Case
13 Number 34-202100313161, Case Number 34-2022-00315620); *Cook-Farrar v. The RealReal,*
14 *Inc.* (Case Number CGC-22-597986, Case Number CGC-22-599036); *Brown v. HP Hood*
15 *LLC* (Case Number 34-2022-00315068, Case Number 34-2022-00318020); *Levingston v.*
16 *Commerce Distribution Company LLC* (Case Number 22STCV05730); *Deaver v. Blue*
17 *Diamond Growers* (Case Number 34-2022-00316490, Case Number 34-2022-00319378);
18 *Lang v. PNS Stores, Inc.* (Case Number 34-2022-00318520); *White v. Cortech West Staffing,*
19 *LLC* (Case Number STK-CV-UOE-2022-0009807); *Chanley v. Growers Transplanting, Inc.*
20 (Case Number 22CV002837); *Bolding v. Cardinal Financial Company* (Case Number
21 CIVSB2206543); *Parra-Marquez v. PRC DeSoto International, Inc.* (Case Number BCV-22-
22 100704); *Khoshchin v. Atria Management Company, LLC* (Case Number 2:22-cv-00916-TLN-
23 KJN, Case Number 34-2022-00322277-CU-OE-GDS); *Galvez v. Joseph J. Albanese, Inc.*
24 (Case Number 22CV397197); *Marsh v. Burberry* (Case Number 22CV016122); *Conner v.*
25 *Red Wing Brands of America* (Case Number 22-CIV-03830). I have also assisted the firm in
26 numerous wage and hour class action mediations. Most recently, I assisted the firm in
27 successfully obtaining class certification by the United States District Court, Central District
28 of California in the case of *Sims v. QG Printing II, LLC* (Case Number ED CV 20-1632-DMG

1 (KKx)) and by the Santa Clara Superior Court in the case of *Flores v. San Jose, LLC* (Case
2 Number 20CV371772).

3 8. I have no conflicts with the Class and will adequately represent the Class.

4 9. I do not have any relationship with the proposed *cy pres* beneficiary Watsonville
5 Law Center.

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

8 Executed on this 1st day of March 2024, at Los Angeles, California.

9 

10 Christine S. Lee
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28