

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 LARRY W. 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 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 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 their own independent investigation and evaluation, the Parties and their respective counsel are of the opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class Action and PAGA Settlement ("Settlement Agreement") is fair, reasonable, and adequate and is in the best interests of the Class and Defendants in light of all known facts and circumstances and the expenses and risks inherent in litigation.

3. I have spent significant time researching and pursuing the claims that have been alleged in this action. From the inception of the case, Class Counsel have zealously represented the interests of the Class. Class Counsel have engaged in significant meet and confer discussions with opposing counsel to obtain informal data and documents and to discuss the merits of the claims on behalf of the Class. This settlement was obtained for the benefit of the Class, as opposed to the individual Class Representatives. Based on my review of all the documents and information, and based on my experience in class action litigation, I believe this settlement to be fair, adequate, and reasonable.

4. I was retained based upon a contingency fee arrangement wherein Plaintiffs' counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiffs failed to prevail in this case, counsel for Plaintiffs would have spent a significant amount of time, money and other resources without any benefit or return. In addition, Defendants would have been able to seek costs in connection with their defense of the case had Plaintiffs failed to prevail in the present case.

5. I am one of the primary attorneys on this matter. My qualifications are as

1 follows: I received my J.D. from Arizona State University College of Law in 2003. During law
2 school, I was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated
3 cum laude from Arizona State University College of Law in the top 10% of my class. While I
4 was in law school, I was the Associate Managing Editor of the Arizona State University
5 College of Law, Law Journal. Upon graduation, I practiced law as an associate at the Los
6 Angeles County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national
7 employment defense law firm that represents a significant number of Fortune 500 companies.

8 6. My firm's primary focus is employment law. I have handled a number of wage
9 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
10 encompasses cases throughout the State of California, including but not limited to the Los
11 Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County
12 Superior Courts, the San Diego County Superior Courts, and the United States District Courts
13 for the Central, Eastern, Northern, and Southern Districts of California.

14 7. I have been named as class counsel in a number of class actions that have been
15 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
16 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
17 County, Santa Clara County, Sonoma County, and the United States District Court for the
18 Central, Eastern, and Northern Districts of California, including but not limited to the
19 following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court
20 Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior
21 Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-
22 0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
23 Judicial Council Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior
24 Court Case No. BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination
25 Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-
26 00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County Superior
27 Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court
28 Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*,

1 Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*,
2 Yolo County Superior Court Case No. CV-18-558.

3 8. My co-counsel and I will adequately represent the Class Members in this action.
4 Plaintiffs' Counsel have and will zealously represent Plaintiffs and the Class and pursue this
5 lawsuit to its conclusion. I have no conflicts with the Class and will adequately represent the
6 Class.

7 9. Diversity Law Group does not have any relationship with or connection to
8 Watsonville Law Center, the proposed *cy pres* beneficiary.

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

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

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