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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

PERLA MARIN, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

HB LEISURE, INC., a Florida corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 37-2021-00048225-CU-OE-CTL

(Assigned to the Honorable Eddie C. Sturgeon,
Department 67)

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

Date: February 16, 2024

Time: 9:00 a.m.

Dept.: 67

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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, P.C., one of the attorneys of record for Plaintiff Perla Marin (“Plaintiff”). I have personal knowledge of the facts set forth below and I am called to testify I could and would do so competently.

2. Based on Class Counsel's independent investigations and evaluations, I am of opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Class Members, in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arm's length and thus, should be granted final approval.

3. 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. After law school, I was a Legal Intern for the U.S. Department of Veterans Affairs, a Judicial Law Clerk for the Honorable James A. Bonifant of the Circuit Court for Montgomery County, and a Law Firm Associate for the Law Firm of Paley Rothman. I was also a Law Clerk for the Law Firm 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.

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

5. I am currently handling numerous wage and hour class action and PAGA
s, including *Marin v. Sea World LLC* (Case Number 37-2021-00047859-CU-OE-CTL,

Case Number Case Number 37-2022-00001083-CU-OE-CTL); *Marin v. HB Leisure, Inc.* (Lead Case Number 37-2021-00048225-CU-OE-CTL); *McFarland v. Helix Electric, Inc.* (Case Number 21CV391268, Case Number 22CV394399); *Ford v. The Silver F, Inc.* (Case Number 34-202100313161, Case Number 34-2022-00315620); *Cook-Farrar v. The RealReal, Inc.* (Case Number CGC-22-597986, Case Number CGC-22-599036); *Brown v. HP Hood LLC* (Case Number 34-2022-00315068, Case Number 34-2022-00318020); *Levingston v. Commerce Distribution Company LLC* (Case Number 22STCV05730); *Deaver v. Blue Diamond Growers* (Case Number 34-2022-00316490, Case Number 34-2022-00319378); *Lang v. PNS Stores, Inc.* (Case Number 34-2022-00318520); *White v. Cortech West Staffing, LLC* (Case Number STK-CV-UOE-2022-0009807); *Chanley v. Growers Transplanting, Inc.* (Case Number 22CV002837); *Bolding v. Cardinal Financial Company* (Case Number CIVSB2206543); *Parra-Marquez v. PRC DeSoto International, Inc.* (Case Number BCV-22-100704); *Khoshchin v. Atria Management Company, LLC* (Case Number 2:22-cv-00916-TLN-KJN, Case Number 34-2022-00322277-CU-OE-GDS); *Galvez v. Joseph J. Albanese, Inc.* (Case Number 22CV397197); *Marsh v. Burberry* (Case Number 22CV016122); *Conner v. Red Wing Brands of America* (Case Number 22-CIV-03830). I have also assisted the firm in numerous wage and hour class action mediations. Most recently, I assisted the firm in successfully obtaining class certification by the United States District Court, Central District of California in the case of *Sims v. QG Printing II, LLC* (Case Number ED CV 20-1632-DMG (KKx)) and by the Santa Clara Superior Court in the case of *Flores v. San Jose, LLC* (Case Number 20CV371772).

6. To date, I have incurred approximately 80.1 hours in connection with the litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred to date.

7. I also anticipate spending an additional 6.7 hours attending the final approval motion, conferring and reviewing e-mails and other written communications with counsel for Defendant, the Settlement Administrator, and Class Members regarding post final approval matters, including payments and related issues.

8. The total lodestar for my hours will be approximately \$34,720.00 based on an hourly rate of \$400.00 per hour (86.8 x \$400.00).

9. Twenty-five percent (25%) of any remaining monies from uncashed settlement checks will be distributed to the State Treasury for deposit in the Trial Court Improvement and Modernization Fund. The remaining seventy-five percent (75%) will be distributed to Free to Thrive, in accordance with California Code of Civil Procedure § 384. I do not have any relationship with or connection to said organizations/programs.

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

Executed on this 24th day of January 2024, at Los Angeles, California.

Christine S. Lee

EXHIBIT A

Perla Marin v. HB Leisure, Inc.
Time and Task Chart for Christine S. Lee

Hours	Description of Work
2.7	Factual investigation, review of file and client documents, review PAGA letter, confer with client regarding the case upon assignment to case
3.9	Draft complaint; further review and revise complaint
1.2	Review Defendant's Answer
2.5	Meet and confer with opposing counsel for case management conferences, draft, review and revise several CMC statements in connection therewith
4.6	Review pleadings, settlement documents, and dockets for related cases, confer with co-counsel regarding same
3.8	Draft written discovery, Requests for Production of Documents and Special Interrogatories, Set One
8.2	Draft responses to Defendant's written discovery requests—Form Interrogatories, Requests for Production of Documents, and Special Interrogatories, Set One, discussions with client regarding same, confer with co-counsel regarding same
2.7	Review document production in connection with Plaintiff's discovery responses to Defendant's first set of written discovery
1.5	Several telephonic and e-mail meet and confer discussions with opposing counsel regarding settlement
1.2	Draft and prepare informal discovery requests, confer with opposing counsel re sampling method for class member records
2.3	Prepare for and attend case management conference; confer with counsel regarding trial dates and class certification deadlines
.5	Meet and confer with counsel regarding discovery deadlines
7.1	Review Defendant's written discovery responses
4.3	Review and analyze production of formal and informal discovery for mediation, including document production (166 pages), class payroll and time data spreadsheets, wage statements, and documents re: Defendant's various policies; numerous meet and confer communications with opposing counsel regarding data and document production
4.5	Review and revise long-form settlement agreement; confer with opposing counsel regarding terms therein; confer with client regarding same
3.8	Review and revise class notice to be sent to class members; confer with opposing counsel regarding same
1.3	Correspondence with settlement administrator regarding administration matters and admin expenses

1.2	Further review and revise long-form settlement agreement and notice
8.5	Draft motion for preliminary approval of settlement, proposed order, and supporting documents; further revise same
2.6	Review weekly mailing reports from settlement administrator; confer with settlement administrator regarding final approval; review admin declaration
9.3	Draft motion for final approval of settlement, proposed order, and supporting documents; further revise same
2.4	Draft supplemental briefing for final approval of settlement and supporting documents; further revise same
6.7	Anticipated time to finalize matter
<u>86.8</u>	<u>TOTAL HOURS</u>