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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 PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: October 6, 2023

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 declare under penalty of perjury that I am qualified to testify I could and would do so competently.

2. Based on my own independent investigation and evaluation, I am of opinion that the proposed Settlement is fair, reasonable, and adequate and is in the best interests of the Class in light of the facts and circumstances and the expenses and risks inherent in litigation.

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

4. After taking into account sharply disputed factual and legal issues involved in this case, the risks attending further prosecution, and the substantial benefits to be received from the compromise and settlement of the litigation, I believe this settlement to be fair, reasonable, 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. 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 Paralegal 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.

6. 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

1 both plaintiff and defense sides. The firm currently has cases in Alameda Superior Court, San
2 Diego Superior Court, Santa Clara Superior Court, Sacramento Superior Court, Alameda
3 Superior Court, Monterey Superior Court, San Francisco Superior Court, San Joaquin Superior
4 Court, Kern County Superior Court, San Bernardino Superior Court, and the United States
5 District Courts for the Central, Northern, and Eastern Districts of California.

6 7. I am currently handling numerous wage and hour class action and PAGA
7 lawsuits, including *Marin v. Sea World LLC* (Case Number 37-2021-00047859-CU-OE-CTL,
8 Case Number Case Number 37-2022-00001083-CU-OE-CTL); *Marin v. HB Leisure, Inc.* (Lead
9 Case Number 37-2021-00048225-CU-OE-CTL); *McFarland v. Helix Electric, Inc.* (Case
10 Number 21CV391268, Case Number 22CV394399); *Ford v. The Silver F, Inc.* (Case Number
11 34-202100313161, Case Number 34-2022-00315620); *Cook-Farrar v. The RealReal, Inc.* (Case
12 Number CGC-22-597986, Case Number CGC-22-599036); *Brown v. HP Hood LLC* (Case
13 Number 34-2022-00315068, Case Number 34-2022-00318020); *Levingston v. Commerce*
14 *Distribution Company LLC* (Case Number 22STCV05730); *Deaver v. Blue Diamond Growers*
15 (Case Number 34-2022-00316490, Case Number 34-2022-00319378); *Lang v. PNS Stores, Inc.*
16 (Case Number 34-2022-00318520); *White v. Cortech West Staffing, LLC* (Case Number STK-
17 CV-UOE-2022-0009807); *Chanley v. Growers Transplanting, Inc.* (Case Number
18 22CV002837); *Bolding v. Cardinal Financial Company* (Case Number CIVSB2206543); *Parra-*
19 *Marquez v. PRC DeSoto International, Inc.* (Case Number BCV-22-100704); *Khoshchin v. Atria*
20 *Management Company, LLC* (Case Number 2:22-cv-00916-TLN-KJN, Case Number 34-2022-
21 00322277-CU-OE-GDS); *Galvez v. Joseph J. Albanese, Inc.* (Case Number 22CV397197);
22 *Marsh v. Burberry* (Case Number 22CV016122); *Conner v. Red Wing Brands of America* (Case
23 Number 22-CIV-03830). I have also assisted the firm in numerous wage and hour class action
24 mediations. Most recently, I assisted the firm in successfully obtaining class certification by the
25 United States District Court, Central District of California in the case of *Sims v. QG Printing II,*
26 *LLC* (Case Number ED CV 20-1632-DMG (KKx)) and by the Santa Clara Superior Court in the
27 case of *Flores v. San Jose, LLC* (Case Number 20CV371772).

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

1 9. I do not have any relationship with Free to Thrive.

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

4 Executed on this 1st day of May 2023, at Los Angeles, California.

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