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Attorneys for Plaintiff and the Class

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

ANISHA WISE, individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

LA PETITE ACADEMY, INC., a Delaware
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. STK-CV-UOE-2021-10461

(Assigned for all purposes to the Hon. Erin Guy
Castillo, Dept. 10B)

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

Date: November 14, 2022
Time: 9:00 a.m.
Dept.: 10B

Complaint Filed: November 9, 2021
FAC Filed: May 2, 2022
Trial Date: None 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 Plaintiff Anisha Wise (“Plaintiff”). 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 Class Counsel’s independent investigations and evaluations, I am of the 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 was facilitated by an experienced and neutral mediator. Thus, this settlement should be granted final approval.

3. My qualifications are as follows: I received my JD from Arizona State University College of Law in 2003. During law school, I was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated *cum laude* from Arizona State University College of Law in the top 10% of my class. While I was in law school, I was the Associate Managing Editor of the Arizona State University College of Law, Law Journal. For more than one and one-half years after graduating from law school, I practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm, representing Fortune 500 companies in employment matters, including wage and hour class actions.

4. 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 have a practice that encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior Courts, the San Diego County Superior Courts, and the United States District Courts for the Central, Northern, and Eastern Districts of California. I have been named as Class Counsel in a number of class actions that have been granted final approval by the Superior Courts of Los Angeles County, Orange County, San Francisco County, and the United States District Court for the Central District of California, including the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-05-445143; *Naqvi v.*

1 *Acoustic Home Loans et al.*, Orange County Superior Court Case No. 05CC00263; *Ortega v. AIG*,
2 Central District of California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime*
3 *Cases*, Orange County Superior Court Case No. JCCP 4480; *Tse v. Best Buy*, Los Angeles Superior
4 Court Case No. BC392717; and *Hernandez v. CVS Corporation*, Los Angeles Superior Court Case
5 No. JCCP 4539.

6 5. I have been approved as class counsel in numerous other wage/hour class actions that
7 have been granted class certification and final approval, including *Stafford v. Brinks et al.*, Los
8 Angeles County Superior Court Case No. BC532260; *Chavez v. Kenneth Cole Productions, Inc.*,
9 Santa Clara Superior Court Case No. 17CV306407; *Chavez v. Adidas*, U.S. District Court for the
10 Northern District of California Case No. 5:16-cv-06533-LHK; *Mankin v. Taste Catering*, San Mateo
11 Superior Court Case No. 17-CIV-03497; *Ricardo Macias v. SASCO*, Santa Clara County Superior
12 Court Case No. 16CV304263; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey
13 Superior Court Case No. 17CV003452; *Diaz v. WeDriveU*, Santa Clara Superior Court Case No.
14 17CV306547; *Sanchez v. American Para Professional Systems, Inc.*, Santa Clara County Superior
15 Court Case No. 17CV306751; *Hernandez v Pei Wei*, United States District Court, Central District of
16 California Case No. 8:17-cv-00679-JLS-JCG; *Song v. THC-Orange County, Inc.*, U.S. District Court
17 for the Central District of California Case No. 8:17-cv00965-JLS-DFMx; *Perez v. Standard Drywall,*
18 *Inc.*, Alameda County Superior Court Case No. RG15761142; *Huertas v. Chevron Stations*, Santa
19 Clara Superior Court Case No. 17CV309996; and *In re DirecTv Wage and Hour Cases*, JCCP Case
20 No. 4850, *Hernandez v. Wells Fargo Bank*, Santa Clara County Superior Court Case No.
21 16CV299319, *Carrillo v. New Balance Athletics, Inc.*, Santa Clara County Superior Court Case No.
22 19CV352469; *Ramirez v. Walgreen Co.*, United States District Court, Northern District of California
23 Case No. 18-cv-03921-EJD, *Chavez v. Converse, Inc.*, United States District Court, Northern District
24 of California Case No. 15-cv-03746-NC; *Foster v. Schindler Elevator Corporation*, Alameda County
25 Superior Court Case No. RG19029640; *Foaad Hanna v. Equinix, LLC*, Santa Clara County Superior
26 Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court
27 Case No. BC720144; *Mary Della Maggiora v. Watsonville Community Hospital*, Santa Cruz County
28 Superior Court Case No. 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino

1 County Superior Court Case No. CIVDS1823132; *Michael Randolph v. Pacific Racing Association*,
2 Alameda County Superior Court Case No. RG18908139; *Markham v. Quik Stop Markets, Inc.*, Santa
3 Clara Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*, Ventura Superior Court Case No.
4 56-2019-005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San Bernardino Superior Court
5 Case No. CIVDS1828867, and *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*,
6 Santa Clara Superior Court Case No. 19CV345211.

7 6. My firm has incurred costs in the amount of \$5,119.01. The costs are all litigation-
8 related costs, including court filing fees, CourtCall expenses, reproduction and photocopy costs, and
9 postage. Attached hereto as **Exhibit A** is a copy of costs my firm has incurred in connection with the
10 prosecution of this lawsuit.

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

13 Executed on this 19th day of October 2022, at Los Angeles, California.

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16 _____
17 Larry W. Lee
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EXHIBIT A

10/19/2022
3:19 PM

DIVERSITY LAW GROUP
Slip Listing

Page 1

Selection Criteria

Slip Classification Open
Client (hand select) Include: Wise, Anisha v. La Petite CA
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
69547	EXP	Olympia	1	75.00	75.00
11/3/2021		Court fees			
WIP		Wise, Anisha v. La Petite CA			
LWDA					
69943	EXP	Olympia	1	1729.54	1729.54
11/9/2021		Atty Service			
WIP		Wise, Anisha v. La Petite CA			
Attorney Service - Complaint					
69983	EXP	Olympia	1	73.10	73.10
11/22/2021		Atty Service			
WIP		Wise, Anisha v. La Petite CA			
Attorney Service - Complaint Service					
70068	EXP	Olympia	2	0.25	0.50
11/30/2021		Photocopies			
WIP		Wise, Anisha v. La Petite CA			
Photocopies					
70069	EXP	Olympia	1	7.33	7.33
11/30/2021		Postage			
WIP		Wise, Anisha v. La Petite CA			
Postage					
70572	EXP	Christine Choo	1	1732.54	1732.54
1/7/2022		Atty Service			
WIP		Wise, Anisha v. La Petite CA			
Attorney Service - Complaint					
70573	EXP	Christine Choo	1	49.25	49.25
1/7/2022		Atty Service			
WIP		Wise, Anisha v. La Petite CA			
Attorney Service - CMS					
71020	EXP	Olympia	1	142.10	142.10
2/8/2022		Atty Service			
WIP		Wise, Anisha v. La Petite CA			
Attorney Service - Notice & Acknowledgment & POS of Summons					

10/19/2022
3:19 PM

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Slip Listing

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
71707 EXP 4/26/2022 WIP Attorney Service - Joint Stip	Erika Mejia Atty Service Wise, Anisha v. La Petite CA	1	183.04	183.04
72144 EXP 5/9/2022 WIP Attorney Service - NOE Judgment	Erika Mejia Atty Service Wise, Anisha v. La Petite CA	1	157.54	157.54
72372 EXP 6/6/2022 WIP Attorney Service - MPA	Erika Mejia Atty Service Wise, Anisha v. La Petite CA	1	315.54	315.54
72392 EXP 6/13/2022 WIP Attorney Service - Amended Notice of Motion	Erika Mejia Atty Service Wise, Anisha v. La Petite CA	1	155.54	155.54
72667 EXP 7/19/2022 WIP Attorney Service - Request for Dismissal	Erika Mejia Atty Service Wise, Anisha v. La Petite CA	1	197.35	197.35
72668 EXP 7/21/2022 WIP Attorney Service - CMS	Erika Mejia Atty Service Wise, Anisha v. La Petite CA	1	157.04	157.04
72957 EXP 8/5/2022 WIP Attorney Service - CMS	Erika Mejia Atty Service Wise, Anisha v. La Petite CA	1	143.60	143.60
Grand Total	Billable Unbillable Total	0.00 0.00 0.00		5119.01 0.00 5119.01