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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

VINCENT RAMSEY JR., individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

PACKAGING CORPORATION OF AMERICA,
et al.,

Defendants.

VINCENT RAMSEY JR., individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

PACKAGING CORPORATION OF AMERICA,
et al.,

Defendants.

Case No. 34-2021-00313350-CU-OE-GDS
[Consolidated with 34-2022-00316273-CU-OE-GDS]

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

Date: November 17, 2023

Time: 9:00 a.m.

Dept.: 28

Complaint Filed: December 29, 2021

FAC Filed: July 1, 2022

Trial Date: None

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 Vincent Ramsey Jr. ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. The Class Notice provided Class Members with my office's contact information, where they could further seek information regarding the class settlement, leave questions for the Settlement Administrator, and update their address.

3. There were no objections to the amount of attorney's fees or litigation costs that Class Counsel seek in this case and for which Plaintiff asks the Court for final approval.

4. The Stipulation re: Settlement of Class and PAGA Action ("Settlement Agreement") was the product of negotiation between highly able and experienced attorneys on both sides who possessed the relevant data and legal research which they had carefully analyzed. Class Counsel engaged in extensive factual investigation before settling, including reviewing class data and Defendants' pertinent policies and practices relevant to valuing this case. This allowed Plaintiff to conduct a full damage analysis.

5. The settlement in the case at bar warrants approval and carries a presumption of fairness. As previously noted in the application for Preliminary Approval, this current settlement was negotiated at arm's length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Class Members as a whole.

6. I have been approved as class counsel in numerous other wage/hour class actions that have been granted class certification and final approval.

7. I am one of the primary attorneys on this matter. My qualifications are as follows: I received my J.D. 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,

1 Law Journal. Upon graduation, I practiced law as an associate at the Los Angeles County offices
2 of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm that
3 represents a significant number of Fortune 500 companies.

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

10 9. I have been named as class counsel in a number of class actions that have been
11 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
12 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
13 County, Santa Clara County, Sonoma County, and other counties, as well as the United States
14 District Court for the Central, Eastern, and Northern Districts of California, including but not
15 limited to the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
16 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
17 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
18 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
19 Judicial Council Coordination Proceeding No. 4480; *Hernandez v. CVS Corp. et al.*, Judicial
20 Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior
21 Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey Peninsula*,
22 Monterey County Superior Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa
23 Clara Superior Court Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard*
24 *Drywall, Inc.*, Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget*
25 *Market, Inc.*, Yolo County Superior Court Case No. CV-18-558.

26 10. To date, I have incurred approximately 85.5 hours in connection with the
27 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred
28 to date. I also anticipate spending an additional 10 hours finalizing the settlement following

1 Court approval. This time will be spent interfacing with the administrator, defense counsel, and
2 responding to questions and requests for information from class members.

3 11. The total lodestar for my hours will be approximately \$76,400.00 which includes
4 the anticipated time addressed above, based on an hourly rate of \$800.00 per hour. Since at least
5 2020, I have been approved at an hourly rate of \$750.00 per hour by various Courts. Examples of
6 these Courts include the following cases: *Hernandez v. Wells Fargo Bank*, Santa Clara County
7 Superior Court Case No. 16CV299319, *Carrillo v. New Balance Athletics, Inc.*, Santa Clara
8 County Superior Court Case No. 19CV352469; *Ramirez v. Walgreen Co.*, United States District
9 Court, Northern District of California Case No. 18-cv-03921-EJD, *Chavez v. Converse, Inc.*,
10 United States District Court, Northern District of California Case No. 15-cv-03746-NC; *Foster v.*
11 *Schindler Elevator Corporation*, Alameda County Superior Court Case No. RG19029640; *Foaad*
12 *Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No. 18CV339365; *Alicia*
13 *Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No. BC720144; *Mary Della*
14 *Maggiore v. Watsonville Community Hospital*, Santa Cruz County Superior Court Case No.
15 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino County Superior Court
16 Case No. CIVDS1823132; *Michael Randolph v. Pacific Racing Association*, Alameda County
17 Superior Court Case No. RG18908139; *Markham v. Quik Stop Markets, Inc.*, Santa Clara County
18 Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*, Ventura County Superior Court
19 Case No. 56-2019-005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San Bernardino
20 County Superior Court Case No. CIVDS1828867, and *Prexxie Pascual and Arturo Fonseca v.*
21 *Satellite Healthcare, Inc.*, Santa Clara County Superior Court Case No. 19CV345211. I was
22 approved at an hourly rate of \$800.00 per hour in *Martinez and Acosta v. City of Hope National*
23 *Medical Center, et al.*, San Bernardino County Superior Court Case No. CIVDS2015729, *Jaime*
24 *Moen v. Genentech, Inc.*, San Diego County Superior Court Case No. 37-2021-00008619-CU-
25 OE-CTL, *Murray v. Granite Wellness Centers et al.*, Nevada County Superior Court Case No.
26 CU20-084680, and *Smith, et al. v. Clean Harbors Environmental Services, Inc.*, Sacramento
27 County Superior Court Case No. 34-2021-00292526.

28 12. My firm has incurred costs in the amount of \$14,662.06. The costs are all

1 litigation related costs, including filing fees, messenger costs, mediation fees, and other costs.
2 Attached hereto as **Exhibit B** is a copy of the costs my firm has incurred in connection with
3 prosecution of this lawsuit, as consolidated.

4 13. I do not have any connection or conflict of interest with the proposed cy pres
5 beneficiary, Center for Employment Opportunities.

6 14. Plaintiff signed a written retainer agreement that governs my firm and my co-
7 counsel's representation of him in this action. The written agreement expressly provides that the
8 fees ultimately approved by the Court will be split between counsel. Pursuant to the written
9 agreement, Diversity Law Group will receive two-thirds (2/3) of the legal fees recovered and
10 Webber & Egbert Employment Law, P.C. (formerly Webber Law Group, P.C.) will receive one-
11 third (1/3) of the legal fees recovered. The written agreement advised Plaintiff that the agreement
12 to split legal fees would not increase the fees owed by Plaintiff for his representation.

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

15 Executed on this 25th day of October 2023, at Los Angeles, California.

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17 Larry W. Lee
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EXHIBIT A

Ramsey v. Packaging Corporation of America, et. al. (as consolidated)
Larry W. Lee Time and Task Chart

Hours	Description of Work
8.2	Review client documents and potential theories of recovery; review and revise class action complaint and PAGA letter; confer with counsel re same
2.3	Review and revise PAGA complaint
3.1	Review and revise motion to consolidate; confer with counsel re same
1.6	Review and revise first amended class complaint
7.4	Review and research related cases and prior class settlements against Defendant; analyze impact of same on current lawsuit
1.1	Review and revise joint CMC statements; meet and confer with counsel re same
4.9	Review and revise first set of discovery requests to defendant; confer with counsel re same
6.6	Review Defendant's responses to written discovery; confer with counsel re same
2.1	Review and revise mediation data request; confer with counsel re same.
14.2	Review and revise mediation briefs; analyze class damages for same; attend mediations; significant post-mediation settlement discussions with counsel and mediator.
3.5	Review and revise MOU; confer with counsel re same
8.8	Review and revise long form settlement agreement and supporting documents; confer with counsel re same.
7.6	Review and revise motion for preliminary approval and supporting documents
5.8	Review tentative ruling re preliminary approval; review and revise amended settlement documents re same; review and revise supplemental briefs for same
3.7	Confer with class members re settlement issues
4.9	Review and revise motion for final approval and supporting documents
85.5	TOTAL HOURS

EXHIBIT B

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Slip Listing

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Selection Criteria

Slip Classification Open
Client (hand select) Include: Ramsey, Vincent v. PCA 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		
70145	EXP	Mariana Becerra	1	75.00	75.00
12/21/2021		Court fees			
WIP		Ramsey, Vincent v. PCA CA			
LWDA					
70328	EXP	Linda Lee	1	1639.71	1639.71
12/29/2021		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - Complaint					
70387	EXP	Olympia	2	0.25	0.50
12/31/2021		Photocopies			
WIP		Ramsey, Vincent v. PCA CA			
Photocopies					
70388	EXP	Olympia	1	7.33	7.33
12/31/2021		Postage			
WIP		Ramsey, Vincent v. PCA CA			
Postage					
70585	EXP	Linda Lee	1	94.60	94.60
1/12/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - Complaint Service					
70593	EXP	Linda Lee	1	92.45	92.45
1/13/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - Complaint Service					
70597	EXP	Linda Lee	1	56.21	56.21
1/18/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - POS of Summons					
70613	EXP	Linda Lee	1	57.21	57.21
1/20/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - POS of Summons					

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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		
71045	EXP	Olympia	1	61.71	61.71
2/16/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - Notice					
71179	EXP	Olympia	11	0.25	2.75
2/28/2022		Photocopies			
WIP		Ramsey, Vincent v. PCA CA			
Photocopies					
71180	EXP	Olympia	1	0.73	0.73
2/28/2022		Postage			
WIP		Ramsey, Vincent v. PCA CA			
Postage					
71983	EXP	Olympia	28	0.25	7.00
4/30/2022		Photocopies			
WIP		Ramsey, Vincent v. PCA CA			
Photocopies					
71984	EXP	Olympia	1	2.16	2.16
4/30/2022		Postage			
WIP		Ramsey, Vincent v. PCA CA			
Postage					
72140	EXP	Olympia	1	58.71	58.71
5/6/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - Notice of Minute Order					
72147	EXP	Erika Mejia	1	133.71	133.71
5/10/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service					
72069	EXP	Olympia	1	0.53	0.53
5/31/2022		Postage			
WIP		Ramsey, Vincent v. PCA CA			
Postage					
72068	EXP	Olympia	5	0.25	1.25
5/31/2022		Photocopies			
WIP		Ramsey, Vincent v. PCA CA			
Photocopies					
72642	EXP	Erika Mejia	1	94.27	94.27
7/1/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - FAC					

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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		
73298	EXP	Erika Mejia	1	91.27	91.27
9/22/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - CMS					
73121	EXP	Olympia	1	7975.00	7975.00
9/27/2022		Arbitrators			
WIP		Ramsey, Vincent v. PCA CA			
JAMS Mediation					
74351	EXP	Erika Mejia	1	62.24	62.24
1/5/2023		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - Joint CMS					
74869	EXP	Erika Mejia	1	62.24	62.24
3/10/2023		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - Joint CMS					
74914	EXP	Olympia	1	1452.00	1452.00
4/17/2023		Arbitrators			
WIP		Ramsey, Vincent v. PCA CA			
JAMS Mediation					
75426	EXP	Erika Mejia	1	244.24	244.24
5/4/2023		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - MPA					
75642	EXP	Erika Mejia	1	62.24	62.24
6/14/2023		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - Joint CMS					
75661	EXP	Erika Mejia	1	144.99	144.99
6/29/2023		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - Supp Brief					
75838	EXP	Erika Mejia	1	69.24	69.24
7/6/2023		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - Notice of Errata					
75839	EXP	Erika Mejia	1	62.24	62.24
7/6/2023		Atty Service			
WIP		Ramsey, Vincent v. PCA CA			
Attorney Service - Joint CMS					

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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		
76420	EXP	Max Gavron	1	250.00	250.00
10/23/2023		Court fees			
WIP		Ramsey, Vincent v. PCA CA			
MFA Filing					
Grand Total					
			Billable	0.00	12861.53
			Unbillable	0.00	0.00
			Total	0.00	12861.53

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Slip Listing

Page 1

Selection Criteria

Slip Classification Open
Client (hand select) Include: Ramsey, Vincent v. PCA PAGA
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		
71354	EXP	Erika Mejia	1	1671.77	1671.77
3/3/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA PA			
Attorney Service - Complaint					
71654	EXP	Olympia	1	58.71	58.71
4/4/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA PA			
Attorney Service - Notice					
71985	EXP	Olympia	5	0.25	1.25
4/30/2022		Photocopies			
WIP		Ramsey, Vincent v. PCA PA			
Photocopies					
71986	EXP	Olympia	1	0.53	0.53
4/30/2022		Postage			
WIP		Ramsey, Vincent v. PCA PA			
Postage					
72377	EXP	Olympia	1	63.21	63.21
6/7/2022		Atty Service			
WIP		Ramsey, Vincent v. PCA PA			
Attorney Service - Notice of CMC					
72543	EXP	Olympia	14	0.25	3.50
6/30/2022		Photocopies			
WIP		Ramsey, Vincent v. PCA PA			
Photocopies					
72544	EXP	Olympia	1	1.56	1.56
6/30/2022		Postage			
WIP		Ramsey, Vincent v. PCA PA			
Postage					
Grand Total					
			0.00		1800.53

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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		
	Unbillable	0.00		0.00
	Total	0.00		1800.53