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Attorneys for Plaintiff,  
HEA YON SUZZIE DORN, on behalf of herself and all other similarly situated employees

**SUPERIOR COURT OF CALIFORNIA**

**COUNTY OF MONTEREY**

HEA YON SUZZIE DORN, on behalf of  
herself and all similarly aggrieved  
employees,

Plaintiff,

v.

CENTRAL COAST FEDERAL CREDIT  
UNION; and DOES 1 through 50, inclusive,

Defendants.

Case No. 22CV000335

(Assigned to the Honorable Thomas W. Wills,  
Dept. 15)

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

Date: June 30, 2023

Time: 9:00 a.m.

Dept.: 15

Complaint Filed: February 3, 2022

Trial Date: Not Set

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1 employment defense law firm that represents a significant number of Fortune 500 companies.

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

8 8. I have been named as class counsel in a number of class actions that have been  
9 granted final approval by the Superior Courts of Los Angeles County, Orange County, San  
10 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino  
11 County, Santa Clara County, Sonoma County, and the United States District Court for the  
12 Central, Eastern, and Northern Districts of California, including but not limited to the  
13 following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court  
14 Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior  
15 Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-  
16 0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,  
17 Judicial Council Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior  
18 Court Case No. BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination  
19 Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-  
20 00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County Superior  
21 Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court  
22 Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*,  
23 Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*,  
Yolo County Superior Court Case No. CV-18-558.

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

26 Executed on this 7<sup>th</sup> day of June 2023, at Los Angeles, California.

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Larry W. Lee