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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 FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT**

Date: March 8, 2024

Time: 8:30 a.m.

Dept.: 15

Complaint Filed: February 3, 2022

Trial Date: Not Set

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1 Case No. 19CV352469; *Ramirez v. Walgreen Co.*, United States District Court, Northern  
2 District of California Case No. 18-cv-03921-EJD; *Chavez v. Converse, Inc.*, United States  
3 District Court, Northern District of California Case No. 15-cv-03746-NC; *Foster v. Schindler*  
4 *Elevator Corporation*, Alameda County Superior Court Case No. RG19029640; *Foaad Hanna*  
5 *v. Equinix, LLC*, Santa Clara County Superior Court Case No. 18CV339365; *Alicia Harris v.*  
6 *24 Seven LLC*, Los Angeles County Superior Court Case No. BC720144; *Mary Della*  
7 *Maggiore v. Watsonville Community Hospital*, Santa Cruz County Superior Court Case No.  
8 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino County Superior Court  
9 Case No. CIVDS1823132; *Michael Randolph v. Pacific Racing Association*, Alameda County  
10 Superior Court Case No. RG18908139; *Markham v. Quik Stop Markets, Inc.*, Santa Clara  
11 County Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*, Ventura County Superior  
12 Court Case No. 56-2019-005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San  
13 Bernardino County Superior Court Case No. CIVDS1828867; and *Prexxie Pascual and Arturo*  
14 *Fonseca v. Satellite Healthcare, Inc.*, Santa Clara County Superior Court Case No.  
15 19CV345211. I was approved at an hourly rate of \$800.00 per hour in *Martinez and Acosta v.*  
16 *City of Hope National Medical Center, et al.*, San Bernardino County Superior Court Case No.  
17 CIVDS2015729; *Jaime Moen v. Genentech, Inc.*, San Diego County Superior Court Case No.  
18 37-2021-00008619-CU-OE-CTL; *Murray v. Granite Wellness Centers et al.*, Nevada County  
19 Superior Court Case No. CU20-084680; *Smith, et al. v. Clean Harbors Environmental*  
20 *Services, Inc.*, Sacramento County Superior Court Case No. 34-2021-00292526; *Correa et al.*  
21 *v. FedEx Supply Chain, Inc.*, San Bernardino County Superior Court Case No.  
22 CIVDS2023369; *Meguro v. Silicon Valley Bank*, Santa Clara County Superior Court Case No.  
23 20CV369854; and *Linaki v. Genji Pacific, LLC*, Alameda County Superior Court Case No.  
24 RG20074795.

25 9. Should the Court choose to apply an hour rate of \$550.00 per hour, my lodestar  
26 is \$2,695.

27 10. I am one of the primary attorneys on this matter. My qualifications are as  
28 follows: I received my J.D. from Arizona State University College of Law in 2003. During law

1 school, I was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated  
2 cum laude from Arizona State University College of Law in the top 10% of my class. While I  
3 was in law school, I was the Associate Managing Editor of the Arizona State University  
4 College of Law, Law Journal. Upon graduation, I practiced law as an associate at the Los  
5 Angeles County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national  
6 employment defense law firm that represents a significant number of Fortune 500 companies.

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

13 12. I have been named as class counsel in a number of class actions that have been  
14 granted final approval by the Superior Courts of Los Angeles County, Orange County, San  
15 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino  
16 County, Santa Clara County, Sonoma County, and the United States District Court for the  
17 Central, Eastern, and Northern Districts of California, including but not limited to the  
18 following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court  
19 Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior  
20 Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-  
21 0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,  
22 Judicial Council Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior  
23 Court Case No. BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination  
24 Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-  
25 00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County Superior  
26 Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court  
27 Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*,  
28 Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*,

1 Yolo County Superior Court Case No. CV-18-558.

2 13. To date, my firm has incurred costs in the amount of \$595.10. A breakdown of  
3 such costs are as follows:

- 4 • Court Fees - \$266.70
- 5 • Mediation - \$270.00
- 6 • Postage - \$.60
- 7 • Other Expenses - \$57.80

8  
9 I declare under penalty of perjury under the laws of the State of California that the  
10 foregoing is true and correct.

11 Executed on this 14<sup>th</sup> day of February 2024, at Los Angeles, California.

12   
13 \_\_\_\_\_  
14 Larry W. Lee

# EXHIBIT A

***Dorn v. Central Coast Federal Credit Union***  
**Larry W. Lee Time and Task Chart**

| <b>Hours</b> | <b>Description of Work</b>                                             |
|--------------|------------------------------------------------------------------------|
| 1.6          | Review and edit mediation brief.                                       |
| 1.4          | Review and edit long-form settlement agreement.                        |
| 1.0          | Review and edit Motion for Preliminary Approval and supporting papers. |
| .9           | Review and edit Motion for Final Approval and supporting papers.       |
| <b>4.9</b>   | <b>TOTAL HOURS</b>                                                     |

# EXHIBIT B

1/31/2024  
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DIVERSITY LAW GROUP  
Slip Listing

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Selection Criteria

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Slip Classification Open  
Client (hand select) Include: Dorn, Hea Yon Suzzie v. Centra  
Slip.Transaction Ty 2 - 2

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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  |             |            |
| 72300                                 | EXP | Nick Rosenthal              | 1         | 1.47        | 1.47       |
| 5/13/2022                             |     | Telephone                   |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Conference Call                       |     |                             |           |             |            |
| 72103                                 | EXP | Erika Mejia                 | 1         | 3.60        | 3.60       |
| 6/7/2022                              |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - CMS                         |     |                             |           |             |            |
| 73447                                 | EXP | Erika Mejia                 | 1         | 3.60        | 3.60       |
| 11/1/2022                             |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - Joint CMS                   |     |                             |           |             |            |
| 73479                                 | EXP | Olympia                     | 1         | 24.15       | 24.15      |
| 11/4/2022                             |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - Protective Order            |     |                             |           |             |            |
| 73486                                 | EXP | Valeria Tril                | 1         | 3.60        | 3.60       |
| 11/7/2022                             |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - Notice of Remote Appearance |     |                             |           |             |            |
| 73614                                 | EXP | Olympia                     | 1         | 3.60        | 3.60       |
| 11/23/2022                            |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - NOE                         |     |                             |           |             |            |
| 74939                                 | EXP | Kristen Agnew               | 1         | 27.33       | 27.33      |
| 2/27/2023                             |     | Meals                       |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Meal                                  |     |                             |           |             |            |
| 74780                                 | EXP | Erika Mejia                 | 1         | 3.60        | 3.60       |
| 4/3/2023                              |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - Joint CMS                   |     |                             |           |             |            |

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DIVERSITY LAW GROUP  
Slip Listing

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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  |             |            |
| 74831                                 | EXP | Olympia                     | 1         | 270.00      | 270.00     |
| 4/7/2023                              |     | Arbitrators                 |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| JAMS Mediation                        |     |                             |           |             |            |
| 74837                                 | EXP | Valeria Tril                | 1         | 3.60        | 3.60       |
| 4/10/2023                             |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - Notice of Remote Appearance |     |                             |           |             |            |
| 75146                                 | EXP | Olympia                     | 1         | 0.60        | 0.60       |
| 4/30/2023                             |     | Postage                     |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Postage                               |     |                             |           |             |            |
| 75410                                 | EXP | Erika Mejia                 | 1         | 65.25       | 65.25      |
| 6/7/2023                              |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - MPA                         |     |                             |           |             |            |
| 75412                                 | EXP | Erika Mejia                 | 1         | 3.60        | 3.60       |
| 6/7/2023                              |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - Amended POS                 |     |                             |           |             |            |
| 75472                                 | EXP | Erika Mejia                 | 1         | 3.60        | 3.60       |
| 6/8/2023                              |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - Dorn Decl iso MPA           |     |                             |           |             |            |
| 75473                                 | EXP | Erika Mejia                 | 1         | 3.60        | 3.60       |
| 6/8/2023                              |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - Amended Notice of Motion    |     |                             |           |             |            |
| 75475                                 | EXP | Erika Mejia                 | 1         | 3.60        | 3.60       |
| 6/9/2023                              |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - Amended POS                 |     |                             |           |             |            |
| 75497                                 | EXP | Erika Mejia                 | 1         | 3.60        | 3.60       |
| 6/15/2023                             |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - Joint CMS                   |     |                             |           |             |            |
| 75541                                 | EXP | Valeria Tril                | 1         | 3.60        | 3.60       |
| 6/28/2023                             |     | Court fees                  |           |             |            |
| WIP                                   |     | Dorn, Hea Yon Suzzie v. Cen |           |             |            |
| Odyssey - Notice of Remote Appearance |     |                             |           |             |            |

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DIVERSITY LAW GROUP  
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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   |             |            |
| 76028                      | EXP | Nick Rosenthal              | 1          | 29.00       | 29.00      |
| 7/24/2023                  |     | Other travel                |            |             |            |
| WIP                        |     | Dorn, Hea Yon Suzzie v. Cen |            |             |            |
| Travel                     |     |                             |            |             |            |
| 76189                      | EXP | Erika Mejia                 | 1          | 65.25       | 65.25      |
| 9/15/2023                  |     | Court fees                  |            |             |            |
| WIP                        |     | Dorn, Hea Yon Suzzie v. Cen |            |             |            |
| Odyssey - Ex Parte         |     |                             |            |             |            |
| 76231                      | EXP | Erika Mejia                 | 1          | 65.25       | 65.25      |
| 9/26/2023                  |     | Court fees                  |            |             |            |
| WIP                        |     | Dorn, Hea Yon Suzzie v. Cen |            |             |            |
| Odyssey - Ex Parte         |     |                             |            |             |            |
| 76237                      | EXP | Erika Mejia                 | 1          | 3.60        | 3.60       |
| 9/27/2023                  |     | Court fees                  |            |             |            |
| WIP                        |     | Dorn, Hea Yon Suzzie v. Cen |            |             |            |
| Odyssey - Decl re Ex Parte |     |                             |            |             |            |
| Grand Total                |     |                             |            |             |            |
|                            |     |                             | Billable   | 0.00        | 595.10     |
|                            |     |                             | Unbillable | 0.00        | 0.00       |
|                            |     |                             | Total      | 0.00        | 595.10     |