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

Coordination Proceeding
Special Title (Rule 3.550)

HUMANO WAGE AND HOUR CASES

Included actions:

Hines v. Humano LLC

Emmens v. Humano LLC

Thurman v. Humano LLC

JUDICIAL COUNCIL COORDINATION
PROCEEDING
No. 5240

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO
No. 34-2022-00313411

SUPERIOR COURT OF CALIFORNIA
COUNTY OF YOLO
No. CV2021-2225

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
No. CIVSB2227784

*[Assigned for all purposes to Hon. Daniel
M. Wolk, Dept. 8]*

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

Date: December 20, 2024
Time: 10:30 a.m.
Dept.: 8

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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 Virginia, and am with the law firm Diversity Law Group, counsel of record for Plaintiffs Carl Emmens, Jermaine Hines, and Doris Thurman (“Plaintiffs”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so truthfully.

2. As previously noted in the Motion for Preliminary Approval, the Joint
tion of Class Action Settlement (“Settlement Agreement”) was the product of negotiation
n highly able and experienced attorneys on both sides. I support the settlement as fair,
able, and adequate, and in the best interest of the Class as a whole, in light of all known
and circumstances and the expenses and risks inherent in litigation.

3. Class Counsel engaged in extensive legal research and factual investigation settling, including through formal and informal discovery. Counsel also performed a comprehensive damages analysis and negotiated the settlement amount based on a clear understanding of the maximum exposure in this case, which took into account the data produced by Defendant Humano, LLC (“Defendant”) and counsel’s understanding of the law.

4. Class Counsel are experienced and well-qualified class action litigators who have led many wage and hour class actions and have each been certified as class counsel in various other class actions, particularly wage and hour class actions.

5. 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 Editor of the Arizona State University College of Law, Law Journal. Upon graduation, 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 that represents a significant number of Fortune 500 companies.

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

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

24 8. To date, I have incurred approximately 45.90 hours in connection with the
25 litigation of this lawsuit.

26 9. As of January 1, 2024, my hourly rate in class and representative actions is
27 \$900.00 per hour. Thus, I anticipate the total amount of my fees incurred in this case to be
28 approximately \$41,310. I have previously been approved at an hourly rate of \$850.00 by

1 various courts in a number of matters, including *Stephenson v. Healthcare Services, Inc.*,
2 Orange County Superior Court Case No. 30-2019-01078609-CU-OE-CXC, *Lakey v. Poshmark,*
3 *Inc.*, Santa Clara Superior Court, Case No. 22CV395084; *Audycki v. Stanford Health Care,*
4 Santa Clara Case No. 19CV347173; and *Palomino v. Northrop Grumman Systems Corporation,*
5 Santa Clara Superior Court Case No. 19CV345534. More recently, I was approved at an hourly
6 rate of \$900 in the matter of *Jose Valencia v. Sentinel Transportation, LLC*, Santa Barbara
7 Superior Court Case No. 22CV00951 and *Robert Jordan v. Mondelez Global LLC*, San
8 Bernardino Superior Court Case No. CIVSB2202758.

9 10. I do not have an interest in, or relationship with, Legal Aid at Work, the
10 proposed *cy pres* recipient.

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

13 Executed on this 12th day of November 2024, at Los Angeles, California.

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15 _____
16 Larry W. Lee
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