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(ADDITIONAL COUNSEL ON NEXT PAGE)

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

JARED DEAVER, as an individual and on
behalf of all others similarly situated,

Plaintiff,

v.

BLUE DIAMOND GROWERS, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Lead Case No. 34-2022-00316490-CU-OE-
GDS

[Consolidated with Case No. 34-2021-
00304425- CU-OE-GDS and Case No. 34-2022-
00319378]

*Assigned for All Purposes to Honorable
Lauri A. Damrell in Dept 22*

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

Date: January 31, 2025
Time: 9:00 a.m.
Department: 22

RES. ID: A-316490-001

Action Filed: March 9, 2022
Trial Date: None yet

AND RELATED CONSOLIDATED CASES.

ADDITIONAL COUNSEL

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Co-Counsel for Plaintiffs
Daniel Ramirez and Brad Smith, et al.

1 I, Christine S. Lee, hereby declare and state as follows:

2 1. I am an attorney at law duly admitted to practice before all courts in the State of
3 California and am a member of the law firm Diversity Law Group, P.C., one of the attorneys of
4 record for Plaintiff JARED DEEVER ("Plaintiff"), in the above-entitled action. I have personal
5 knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I
6 could and would competently do so.

7 2. Based on their own independent investigations and evaluations, the Parties and
8 their respective counsel are of the opinion that settlement for the consideration and on the terms
9 set forth in the Settlement Agreement are fair, reasonable, and adequate and is in the best
10 interests of the Class and Defendants in light of all known facts and circumstances and the
11 expenses and risks inherent in litigation.

12 3. Plaintiff strongly believes that plaintiff can prevail at trial. However, Plaintiff
13 also believes in the fairness of the settlement, which is based on factoring in the uncertainty and
14 risks to Plaintiff involved in not prevailing on one or more of the causes of action or theories
15 alleged in his Complaint and in the possibility of appeals.

16 4. After taking into account sharply disputed factual and legal issues involved in this
17 litigation, the risks attending further prosecution, and the substantial benefits to be received
18 pursuant to the compromise and settlement of the litigation, Plaintiff and Class Counsel have
19 concluded that settlement on the terms hereinafter set forth is appropriate and in the best interests
20 of the Parties and that this settlement is fair and reasonable.

21 5. Based on my review of all the information, and based on my experience in class
22 action litigation, I believe this settlement to be fair, adequate and reasonable.

23 6. Plaintiff and his counsel are adequate representatives in that they have no
24 conflicts with the class and will adequately represent the class.

25 7. I was retained based upon a contingency fee arrangement wherein Plaintiff's
26 counsel agreed to advance all costs and receive no fee unless a recovery was accomplished.
27 Specifically, had Plaintiff failed to prevail on these cases, counsel for Plaintiff would have spent
28 a significant amount of time, money and other resources without any benefit or return. In

1 addition, had Plaintiff also failed to prevail in the present cases, Defendants would have been
2 able to seek costs in connection with their defense of the case.

3 8. My qualifications are as follows: prior to attending law school, I had
4 approximately 5 years of experience as a Litigation Paralegal. During law school, I was a Legal
5 Intern for the U.S. Department of Veterans Affairs, a Judicial Intern for the Honorable James A.
6 Bonifant of the Circuit Court for Montgomery County, and a Summer Associate for the Law Firm
7 of Paley Rothman. I was also a Law Clerk for the Law Offices of Choi and Associates until I
8 began my employment at Diversity Law Group, P.C. I received my JD from University of
9 Baltimore in 2021. Upon graduation from law school, I was admitted to the California Bar in
10 2021.

11 9. I am currently an associate at the law firm Diversity Law Group, P.C., an
12 employment law firm that has handled numerous wage and hour class and individual actions, on
13 both plaintiff and defense sides. The firm currently has cases in Alameda Superior Court, San
14 Diego Superior Court, Santa Clara Superior Court, Sacramento Superior Court, Alameda
15 Superior Court, Monterey Superior Court, San Francisco Superior Court, San Joaquin Superior
16 Court, Kern County Superior Court, San Bernardino Superior Court, and the United States
17 District Courts for the Central, Northern, and Eastern Districts of California.

18 10. I am currently handling numerous wage and hour class action and PAGA
19 lawsuits, including *Marin v. Sea World LLC* (Case Number 37-2021-00047859-CU-OE-CTL,
20 Case Number Case Number 37-2022-00001083-CU-OE-CTL); *Marin v. HB Leisure, Inc.* (Lead
21 Case Number 37-2021-00048225-CU-OE-CTL); *McFarland v. Helix Electric, Inc.* (Case
22 Number 21CV391268, Case Number 22CV394399); *Ford v. The Silver F, Inc.* (Case Number
23 34-202100313161, Case Number 34-2022-00315620); *Cook-Farrar v. The RealReal, Inc.* (Case
24 Number CGC-22-597986, Case Number CGC-22-599036); *Brown v. HP Hood LLC* (Case
25 Number 34-2022-00315068, Case Number 34-2022-00318020); *Levingston v. Commerce*
26 *Distribution Company LLC* (Case Number 22STCV05730); *Deaver v. Blue Diamond Growers*
27 *(Case Number 34-2022-00316490, Case Number 34-2022-00319378); Lang v. PNS Stores, Inc.*
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1 (Case Number 34-2022-00318520); *White v. Cortech West Staffing, LLC* (Case Number STK-
2 CV-UOE-2022-0009807); *Chanley v. Growers Transplanting, Inc.* (Case Number
3 22CV002837); *Bolding v. Cardinal Financial Company* (Case Number CIVSB2206543); *Parra-*
4 *Marquez v. PRC DeSoto International, Inc.* (Case Number BCV-22-100704); *Khoshchin v. Atria*
5 *Management Company, LLC* (Case Number 2:22-cv-00916-TLN-KJN, Case Number 34-2022-
6 00322277-CU-OE-GDS); *Galvez v. Joseph J. Albanese, Inc.* (Case Number 22CV397197);
7 *Marsh v. Burberry* (Case Number 22CV016122); *Conner v. Red Wing Brands of America* (Case
8 Number 22-CIV-03830). I have also assisted the firm in numerous wage and hour class action
9 mediations. Most recently, I assisted the firm in successfully obtaining class certification by the
10 United States District Court, Central District of California in the case of *Sims v. QG Printing II,*
11 *LLC* (Case Number ED CV 20-1632-DMG (KKx)) and by the Santa Clara Superior Court in the
12 case of *Flores v. San Jose, LLC* (Case Number 20CV371772).

13
14 11. Pursuant to a previously signed agreement by all plaintiffs and their counsel,
15 Plaintiffs' Counsel will be splitting the approved fees as follows: 35% to the Bibyian Law
16 Group, P.C.; 35% to Crosner Legal, P.C.; 9.75% to Diversity Law Group; 9.75% to the Law
17 Offices of Choi & Associates and 10.5% to the Polaris Law Group.

18 12. Pursuant to Local Rule 2.99.05, I have reviewed the checklist for approval of
19 class action settlement for the Complex Litigation Department and believe that the Settlement
20 Agreement complies with the same.

21
22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 Executed on January 3, 2025, at Los Angeles, California.

25 

26 Christine S. Lee