

Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
Christine S. Lee (State Bar No. 339947)
christine@diversitylaw.com
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa St., Suite 1250
Los Angeles, California 90071
(213) 488-6555
(213) 488-6554 facsimile

Attorneys for Plaintiff Jared Deaver and the Class
(ADDITIONAL COUNSEL ON NEXT PAGE)

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

JARED DEEVER, 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 LARRY W. 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

William L. Marder (SBN 170131)
bill@polarislawgroup.com

POLARIS LAW GROUP

501 San Benito Street, Suite 200
Hollister, CA 95023
Telephone: (831) 531-4214
Facsimile: (831) 634-0333

Edward W. Choi, Esq. SBN 211334
edward.choi@choiandassociates.com

LAW OFFICES OF CHOI & ASSOCIATES

515 S. Figueroa St., Suite 1250
Los Angeles, CA 90071
Telephone: (213) 381-1515
Facsimile: (213) 465-4885

Attorneys for Plaintiff Jared Deaver and the Class

David Bibiyan, SBN 287811
david@tomorrowlaw.com
Jeffrey D. Klein, SBN 297296
Jeff@tomorrowlaw.com
Vedang J. Patel, SBN 328647
vedang@tomorrowlaw.com
Bibiyan Law Group, P.C.
8484 Wilshire Blvd., Suite 500
Beverly Hills, CA 90211
Telephone: (310) 556-4811

Attorneys for Plaintiffs
Daniel Ramirez and Brad Smith, et al.

Zachary M. Crosner (SBN 272295)
zach@crosnerlegal.com
Brandon Brouillette (SBN 273156)
bbrouillette@crosnerlegal.com
Chad Saunders (SBN 257810)
chad@crosnerlegal.com
CROSNER LEGAL, PC
9440 Santa Monica Blvd. Suite 301
Beverly Hills, CA 90210
Tel: (866) 276-7637

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

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

2

3
4
5
6

7
8
9
0

- 1
- 2
- 3
- 4
- 5
- 6

8
9
20
21
22

23
24
25
26
27
28

1 *Home Loans et al.*, Orange County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central
2 District of California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*,
3 Orange County Superior Court Case No. JCCP 4480; *Tse v. Best Buy*, Los Angeles Superior Court
4 Case No. BC392717; and *Hernandez v. CVS Corporation*, Los Angeles Superior Court Case No.
5 JCCP 4539.

6 6. Pursuant to a previously signed agreement by all plaintiffs and their counsel,
7 Plaintiffs' Counsel will be splitting the approved fees as follows: 35% to the Bibyan Law Group,
8 P.C.; 35% to Crosner Legal, P.C.; 9.75% to Diversity Law Group; 9.75% to the Law Offices of Choi
9 & Associates and 10.5% to the Polaris Law Group.

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

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

15 Executed on this January 3, 2025, at Los Angeles, California.

16 

17 _____
Larry W. Lee