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Attorneys for Plaintiff Angelica Romero

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

MARIANO GAGLIARDI, individually and on
behalf of all similarly situated and aggrieved
employees,

Plaintiff,

v.

RALPH LAUREN RETAIL, INC., a Delaware
Corporation doing business in California, and
DOES 1 to 100,

Defendants.

Case No. CVRI2103581

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

Date: November 20, 2024

Time: 8:30 a.m.

Dept.: 1

Reservation ID: Per July 12, 2024 Order

AND CONSOLIDATED ACTION.

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1 Francisco County, and the United States District Court for the Central District of California,
2 including the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior
3 Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior
4 Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-
5 RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court Case No.
6 JCCP 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC392717; and *Hernandez v.*
7 *CVS Corporation*, Los Angeles Superior Court Case No. JCCP 4539.

8 6. To date, I have incurred approximately 16.9 hours in connection with the litigation
9 of this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of work I have
10 incurred to date on this matter.

11 7. Thus, I anticipate the total amount of my fees incurred in this case to be
12 approximately \$14,365.00 based on an hourly rate of \$850.00 per hour. I have been approved at an
13 hourly rate of \$800.00 per hour in *Martinez and Acosta v. City of Hope National Medical Center, et*
14 *al.*, San Bernardino County Superior Court Case No. CIVDS2015729; *Jaime Moen v. Genentech,*
15 *Inc.*, San Diego County Superior Court Case No. 37-2021-00008619-CU-OE-CTL; *Murray v.*
16 *Granite Wellness Centers et al.*, Nevada County Superior Court Case No. CU20-084680; *Smith, et*
17 *al. v. Clean Harbors Environmental Services, Inc.*, Sacramento County Superior Court Case No.
18 34-2021-00292526; *Correa et al. v. FedEx Supply Chain, Inc.*, San Bernardino County Superior
19 Court Case No. CIVDS2023369; *Meguro v. Silicon Valley Bank*, Santa Clara County Superior
20 Court Case No. 20CV369854; *Linaki v. Genji Pacific, LLC*, Alameda County Superior Court Case
21 No. RG20074795; and *Robert Jordan v. Mondelez Global, LLC*, San Bernardino County Superior
22 Court Case No. CIVSB2202758.

23 8. I recently increased my hourly rate to \$850.00 per hour. I have been approved at
24 \$850.00 per hour in *Stephenson v. Healthcare Services, Inc.*, Orange County Superior Court Case
25 No. 30-2019-01078609-CU-OE-CXC; *Lakey v. Poshmark, Inc.*, Santa Clara Superior Court, Case
26 No. 22CV395084; *Audycki v. Stanford Health Care*, Santa Clara Case No. 19CV347173; and
27 *Palomino v. Northrop Grumman Systems Corporation*, Santa Clara Superior Court Case No.
28 19CV345534.

9. Counsel for Plaintiffs Mariano Gagliardi and Angelica Romero will be splitting the approved fees as follows: 32.5% to Diversity Law Group; 17.5% to Polaris Law Group; and 50% to Frontier Law Center, which the Plaintiffs have previously authorized in writing.

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

Executed on this 28th day of October 2024, at Los Angeles, California.


Larry W. Lee

EXHIBIT A

Angelica Romero v. Ralph Lauren Retail, Inc.
Time and Task Chart for Larry W. Lee

Hours	Description of Work
1.1	Review and revise complaints and LWDA letter.
2.3	Confer with co-counsel re prospect of global mediation; confer with defense counsel re same.
1.4	Review and revise mediation brief; confer with co-counsel re same.
3.5	Analyze and review data produced in advance of mediation; analyze and review settlement agreement from prior action to address potential impact on theories of liability; confer with co-counsel re same.
2.2	Draft and revise MOU; confer with co-counsel re same.
1.9	Review and edit long form settlement agreement.
1.5	Review and edit Motion for Preliminary Approval and supporting documents.
.9	Review and edit supplemental Motion for Preliminary Approval papers.
2.1	Review and edit Motion for Final Approval.
16.9	<u>Total</u>