

Larry W. Lee (State Bar No. 228175)
Max W. Gavron (State Bar No. 291697)
Kwanporn “Mai” Tulyathan (State Bar No. 316704)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com
mgavron@diversitylaw.com
ktulyathan@diversitylaw.com

Attorneys for Plaintiff and the Aggrieved Employees

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

STEVEN WILLIAMS, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

XANTERRA PARKS & RESORTS, INC.,
a Delaware corporation, doing business as
The Oasis at Death Valley; and DOES 1
through 50, inclusive,

Defendants.

Case No.: ICSI-CVCV-2022-67661

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFF’S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT OF 2004**

Date: September 6, 2024

Time: 9:00 a.m.

Dept.: 1

Complaint Filed: February 17, 2022

Trial Date: None Set

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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 California, and am with the law firm Diversity Law Group, counsel of record for Named Plaintiff Steven Williams (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Plaintiff's Counsel have zealously represented the interests of Plaintiff and the aggrieved employees. The settlement was obtained for the benefit of the aggrieved employees, as opposed to the individual Plaintiff.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the fairness of the settlement, which is based on factoring in the inherent risks in drawn-out litigation, as well as the possibility of appeals.

4. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, I have concluded that settlement on the terms set forth in the Private Attorneys General Act Settlement Agreement and Release (“Settlement Agreement”) is appropriate and in the best interests of Plaintiff and the aggrieved employees.

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 Managing 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.

6. My firm's primary focus is employment law. I have handled a number of wage and hour matters including class actions and multiple-plaintiff actions. I have a practice that

1 encompasses cases in the Los Angeles Superior Courts, Orange County Superior Courts, San
2 Francisco County Superior Courts, San Diego County Superior Courts, and the United States
3 District Courts for the Central, Eastern, Northern, and Southern Districts of California.

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

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

23 Executed on this 13th day of August 2024, at Los Angeles, California.

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Larry W. Lee