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16 Attorneys for Plaintiffs and the Class

17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

18 **COUNTY OF LOS ANGELES**

19 MICHAEL FORD as an individual and on
20 behalf of all others similarly situated,

21 Plaintiffs,

22 vs.

23 AVARTARA LLC; and DOES 1 through 50,
24 inclusive,

25 Defendants.

CASE NO.: 22STCV10348

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT AND PROVISIONAL
CERTIFICATION OF CLASS**

Date: October 30, 2024

Time: 10:00 a.m.

Dept.: 9

1 I, Larry W. Lee, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and am with the law firm Diversity Law Group, P.C., counsel of record for Plaintiffs
4 Michael Ford and Anthony Williams (“Plaintiffs”). I have personal knowledge of the facts set forth
below and if called to testify I could and would do so competently.

5 2. I am one of the primary attorneys on this matter. Based on my own independent
6 investigation and evaluation. The Joint Stipulation of Class and Representative PAGA Consolidated
7 Action Settlement (“Agreement” or “Settlement Agreement”) was the product of arm’s length
8 negotiations between highly able and experienced attorneys on both sides who possessed the
relevant data and extensive legal research which they had carefully analyzed.

9 3. I have spent significant time researching and pursuing the claims that have been
10 alleged in this action. Based on my independent investigations and evaluations, I am of the opinion
11 that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Class
12 Members, in light of all known facts and circumstances, and the expenses and risks inherent in
13 litigation. The settlement was negotiated at arm’s length and was facilitated by an experienced and
14 neutral mediator. Thus, this settlement should be granted final approval.

15 4. My qualifications are as follows: I received my J.D. from Arizona State University
16 College of Law in 2003. During law school, I was a summer associate at the law firm of Brobeck,
17 Phleger & Harrison. I graduated cum laude from Arizona State University College of Law in the top
18 10% of my class. While I was in law school, I was the Associate Managing Editor of the Arizona
19 State University College of Law, Law Journal. Upon graduation, I practiced law as an associate at
20 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.

21 5. My primary practice is employment law. I have handled a number of wage and hour
22 matters including class actions and individual actions, on both plaintiff and defense sides. I have a
23 practice that encompasses cases throughout the State of California, including but not limited to the
24 Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County
25 Superior Courts, the San Diego County Superior Courts, and the United States District Courts for
26 the Central, Eastern, Northern, and Southern Districts of California. I have been named as class
27 counsel in a number of class actions that have been granted final approval by the Superior Courts of
Los Angeles County, Orange County, San Francisco County, Alameda County, Contra Costa

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

13 6. In addition, I was certified as class counsel by the United States District Court,
14 Central District of California in the cases *Abdullah v. U.S. Security* (Case Number CV 09-09554
15 GHK), *Avilez v. Pinkerton Government Services, Inc.* (Case Number SACV 11-0493-DOC),
16 *Dynabursky v. Allied Barton Security Services* (Case Number SACV 12-02210 JST); and *Pace v.*
17 *Petsmart, Inc.* (Case Number SACV 13-500-DOC); by the Northern District of California in the
18 cases of *Harris v. Vector Marketing Corp.*, (Case Number CV 08 5198 EMC), and *Lemus et al. v.*
19 *H&R Block Enterprises, LLC* (Case Number CV-09-03179-SI); and by the Superior Court of
20 California, Orange County in the cases of *De la Cruz v. Abercrombie & Fitch Co. et al.* (Case
21 Number 30-2007-00036240) and *Wu v. General Nutrition Corporation* (Case Number 30-2012-
22 00593759), all as part of the Courts' orders granting class certification pursuant to Rule 23 of the
23 FRCP and California Code of Civil Procedure § 382. I served as lead counsel on these cases.

24 I declare under penalty of perjury that the foregoing is true and correct under the laws of the
25 State of California. Executed on July 3, 2024 in Los Angeles, California.

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LARRY W. LEE