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Attorneys for Plaintiff and the Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

A.J. NICHOLAS BOLDING, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

CARDINAL FINANCIAL COMPANY, a
Pennsylvania limited partnership; and
DOES 1 through 50, inclusive,

Defendants.

Case No. CIVSB2206543

[Assigned to the Hon. Jessica Morgan, Dept. S-26]

**DECLARATION OF CHRISTINE S. LEE IN
SUPPORT OF PLAINTIFF'S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT**

Date: July 1, 2023
Time: 8:30 a.m.
Dept.: S-26

Action Filed: March 22, 2022
Trial Date: Not Set

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I, Christine S. 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, P.C., one of the attorneys of record for Plaintiff A.J. Nicholas Bolding (“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 interest 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 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 Settlement Agreement and Release of PAGA Claims (“Settlement Agreement”) is appropriate and in the best interests of Plaintiff and the Aggrieved Employees.

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

6. I am currently an associate at the law firm Diversity Law Group, P.C., an employment law firm that has handled numerous wage and hour class and individual actions, on both plaintiff and defense sides. The firm currently has cases in Alameda Superior Court, San

1 Diego Superior Court, Santa Clara Superior Court, Sacramento Superior Court, Alameda
2 Superior Court, Monterey Superior Court, San Francisco Superior Court, San Joaquin Superior
3 Court, Kern County Superior Court, San Bernardino Superior Court, and the United States
4 District Courts for the Central, Northern, and Eastern Districts of California.

5 7. I am currently handling numerous wage and hour class action and PAGA
6 lawsuits, including *Marin v. Sea World LLC* (Case Number 37-2021-00047859-CU-OE-CTL,
7 Case Number Case Number 37-2022-00001083-CU-OE-CTL); *Marin v. HB Leisure, Inc.* (Lead
8 Case Number 37-2021-00048225-CU-OE-CTL); *McFarland v. Helix Electric, Inc.* (Case
9 Number 21CV391268, Case Number 22CV394399); *Ford v. The Silver F, Inc.* (Case Number
10 34-202100313161, Case Number 34-2022-00315620); *Cook-Farrar v. The RealReal, Inc.* (Case
11 Number CGC-22-597986, Case Number CGC-22-599036); *Brown v. HP Hood LLC* (Case
12 Number 34-2022-00315068, Case Number 34-2022-00318020); *Levingston v. Commerce
13 Distribution Company LLC* (Case Number 22STCV05730); *Deaver v. Blue Diamond Growers
14* (Case Number 34-2022-00316490, Case Number 34-2022-00319378); *Lang v. PNS Stores, Inc.*
15 (Case Number 34-2022-00318520); *White v. Cortech West Staffing, LLC* (Case Number STK-
16 CV-UOE-2022-0009807); *Chanley v. Growers Transplanting, Inc.* (Case Number
17 22CV002837); *Bolding v. Cardinal Financial Company* (Case Number CIVSB2206543); *Parra-
18 Marquez v. PRC DeSoto International, Inc.* (Case Number BCV-22-100704); *Khoshchin v. Atria
19 Management Company, LLC* (Case Number 2:22-cv-00916-TLN-KJN, Case Number 34-2022-
20 00322277-CU-OE-GDS); *Galvez v. Joseph J. Albanese, Inc.* (Case Number 22CV397197);
21 *Marsh v. Burberry* (Case Number 22CV016122); *Conner v. Red Wing Brands of America* (Case
22 Number 22-CIV-03830). I have also assisted the firm in numerous wage and hour class action
23 mediations. Most recently, I assisted the firm in successfully obtaining class certification by the
24 United States District Court, Central District of California in the case of *Sims v. QG Printing II,
25 LLC* (Case Number ED CV 20-1632-DMG (KKx)) and by the Santa Clara Superior Court in the
26 case of *Flores v. San Jose, LLC* (Case Number 20CV371772).

27 8. To date, I have incurred approximately 27.9 hours in connection with the
28 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred

1 to date.

2 9. The total lodestar for my hours will be approximately \$11,160.00 based on an
3 hourly rate of \$400.00 per hour (27.9 x \$400.00).

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

6 Executed on this 22nd day of April 2024, at Los Angeles, California.

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EXHIBIT A

Bolding v. Cardinal Financial Company
Time and Task Chart for Christine Lee

Hours	Description of Work
0.8	Review PAGA letter.
3.7	Draft and edit complaint.
2.4	Draft and edit data request to be sent to Defense in advance of mediation.
1.7	Review data informally produced by Defendant and perform damages calculation.
3.9	Draft and edit mediation brief.
5.5	Attend mediation.
4.2	Review and revise long-form settlement agreement.
5.7	Draft and edit motion for approval of PAGA settlement and accompanying documents.
27.9	<u>TOTAL HOURS</u>