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Attorneys for Plaintiff and the Class

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

THALIA MARAVILLA, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

LCS COMMUNITY EMPLOYMENT
LLC, an Iowa limited liability company;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: SCV-270452

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

Date: March 12, 2025

Time: 3:00 p.m.

Dept.: 17

Complaint Filed: March 23, 2022

Trial Date: None

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 Plaintiff
4 Thalia Maravilla (“Class Representative” or “Plaintiff”). I have personal knowledge of the facts
5 set forth below and if called to testify I could and would do so competently.

6 2. I am one of the primary attorneys on this matter. I have spent significant time
7 researching and pursuing the claims that have been alleged in this action. Based on my
8 independent investigations and evaluations, I am of the opinion that the proposed settlement is
9 fair, reasonable, and adequate, and is in the best interests of the Class Members, in light of all
10 known facts and circumstances, and the expenses and risks inherent in litigation.

11 3. The Joint Stipulation of Class and Representative Action Settlement
12 (“Agreement” or “Settlement Agreement”) was the product of arm’s length negotiations between
13 highly able and experienced attorneys on both sides who possessed the relevant data and
14 extensive legal research which they had carefully analyzed. Class Counsel engaged in extensive
15 factual investigation before settling. The Parties also participated in a full day of mediation with
16 a highly experienced and well-known mediator, Michael Loeb.

17 4. The funds represented by uncashed settlement checks will be paid out pursuant to
18 California Code of Civil Procedure section 384 to Legal Aid at Work, the designated *cy pres*
19 recipient. I do not maintain an interest in and/or relationship with Legal Aid at Work.

20 5. My qualifications are as follows: I received my J.D. from Arizona State
21 University College of Law in 2003. During law school, I was a summer associate at the law firm
22 of Brobeck, Phleger & Harrison. I graduated cum laude from Arizona State University College
23 of Law in the top 10% of my class. While I was in law school, I was the Associate Managing
24 Editor of the Arizona State University College of Law, Law Journal. Upon graduation, I
25 practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash
26 Smoak & Stewart, P.C., a national employment defense law firm that represents a significant
27 number of Fortune 500 companies.

28 6. My primary practice is employment law. I have handled a number of wage and

hour matters including class actions and individual actions, on both plaintiff and defense sides. I have a practice that encompasses cases throughout the State of California, including but not limited to the Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior Courts, the San Diego County Superior Courts, and the United States District Courts for the Central, Eastern, Northern, and Southern Districts of California. I have been named as class 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 County, Monterey County, San Bernardino County, Santa Clara County, Sonoma County, and the United States District Court for the Central, Eastern, and Northern Districts of California, including but not limited to the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial Council Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No. 17CV003452; *DirectV Wage and Hour Cases*, Santa Clara Superior Court Judicial Council 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.

7. In addition, I was certified as class counsel by the United States District Court, Central District of California in the cases *Abdullah v. U.S. Security* (Case Number CV 09-09554 GHK), *Avilez v. Pinkerton Government Services, Inc.* (Case Number SACV 11-0493-DOC), *Dynabursky v. Allied Barton Security Services* (Case Number SACV 12-02210 JST); and *Pace v. Petsmart, Inc.* (Case Number SACV 13-500-DOC); by the Northern District of California in the cases of *Harris v. Vector Marketing Corp.*, (Case Number CV 08 5198 EMC), and *Lemus et al. v. H&R Block Enterprises, LLC* (Case Number CV-09-03179-SI); and by the Superior Court of

1 California, Orange County in the cases of *De la Cruz v. Abercrombie & Fitch Co. et al.* (Case
2 Number 30-2007-00036240) and *Wu v. General Nutrition Corporation* (Case Number 30-2012-
3 00593759), all as part of the Courts' orders granting class certification pursuant to Rule 23 of the
4 FRCP and California Code of Civil Procedure § 382. I served as lead counsel on these cases.

5 8. To date, I have incurred approximately 57.20 hours in connection with the
6 litigation of this lawsuit. Attached hereto as **Exhibit 1** is a summary of the hours I have incurred
7 to date.

8 9. My hourly rate in class and representative actions is \$900 per hour. Thus, I
9 anticipate the total amount of my fees incurred in this case to be approximately \$51,480 based on
10 an hourly rate of \$900.00 per hour. I have been approved at an hourly rate of \$900 in the matters
11 of *Robert Jordan v. Mondelez Global, LLC*, San Bernardino County Superior Court Case No.
12 CIVSB2202758; *Alexis Tristan v. American Homes 4 Rent, L.P.*, Los Angeles County Superior
13 Court Case No. 23STCV17006; and *Jose Valencia v. Sentinel Transportation, LLC*, Santa
14 Barbara Superior Court Case No. 22CV00951; *In re Humano Wage and Hour Cases*, Judicial
15 Council Coordination Proceeding Case No. 5240.

16 I declare that under the penalty of perjury under the laws of the State of California the
17 foregoing is true and correct. Executed on February 18, 2025, at Los Angeles, California.

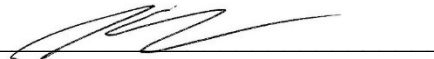
18 
19 Larry W. Lee

EXHIBIT 1

Maravilla v. LCS Community Employment LLC
Time and Task Chart for Larry W. Lee

Hours	Description of Work
6.10	Review initial intake meeting notes; communications with co-counsel re potential causes of actions; conduct legal research and analysis re compensable wait times; prepare analysis re likely cost investment to fund the case as a class action.
2.30	Review and revise PAGA Notice, Class Action Complaint and First Amended Complaint; communications with co-counsel re same.
1.70	Review and revise initial written discovery; communications with co-counsel re same.
2.80	Review Defendant's initial written discovery responses and document production; review meet and confer correspondence re discovery responses; communications with co-counsel re same.
1.20	Ongoing communications with co-counsel re merits of claims and defenses.
3.40	Review and revise PMK deposition notice and outline; confer with co-counsel re same.
1.80	Review and revise motions to compel further responses to discovery; confer with co-counsel re same.
2.90	Review Defendant's supplemental discovery responses; meet and confer re same
21.60	Review mediation statement and exposure analysis; review Defendant's mediation statement; legal research re PREP Act immunity defense; communications with co-counsel re strategy for mediation; attend mediation.
1.70	Review and provide feedback on Memorandum of Understanding ("MOU"); communications with co-counsel re same.
4.50	Review and revise class and representative action settlement agreement; communications with co-counsel re same; review correspondence with defense counsel re proposed revisions to settlement agreement.
3.30	Review and revise motion for preliminary approval and supporting declarations.
3.90	Review and revise motion for final approval and supporting declarations.
57.20	<u>TOTAL HOURS</u>