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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF TULARE

SABRINA GILBERT, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

CENTRAL CALIFORNIA BAKING
COMPANY, an Oregon Corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: VCU291467

[Assigned for all purposes to the Hon. John P.
Bianco, Department 2]

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

Date: April 22, 2024

Time: 8:30 a.m.

Dept.: 2

Complaint Filed: April 26, 2022

FAC Filed: August 21, 2023

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

2. I am one of the primary attorneys on this matter. Based on my own independent investigation and evaluation, I am of the opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class and Representative Action Settlement (“Settlement Agreement” or “Agreement”) is fair, reasonable, and adequate and is in the best interests of the class in light of all known facts and circumstances and the expenses and risks inherent in litigation on.

3. My office was retained based upon a contingency fee arrangement wherein Class Counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Class Counsel, had Plaintiff failed to prevail in the matter, Class Counsel would have spent a substantial amount of time, money and other resources without any benefit or return. For instance, Class Counsel has expended costs to file the instant action, effect service of process, pay mediation fees and other litigation related costs. In addition, had Plaintiff also failed to prevail in the present case, Class Counsel would have been able to seek costs in connection with their defense of the case.

4. Class Counsel are experienced and well-qualified class action litigators who have led many wage and hour class actions and have each been certified as class counsel in numerous other class actions, particularly wage and hour class actions.

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, Rose & 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

1 national employment defense law firm that represents a significant number of Fortune 500
2 companies.

3 6. My firm's primary focus is employment law. I have handled a number of wage and
4 hour matters including class actions and multiple-plaintiff actions. I have a practice that
5 encompasses cases throughout the State of California, including but not limited to the Los Angeles
6 Superior Court, Orange County Superior Court, San Francisco County Superior Court, San Diego
7 County Superior Court, and the United States District Courts for the Central, Eastern, and
8 Northern Districts of California.

9 7. I have been named as Class Counsel in a number of class actions that have been
10 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
11 Francisco County, and the United States District Court for the Central District of California,
12 including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
13 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
14 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
15 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
16 Judicial Council Coordination Proceeding No. 4480; and *Hernandez v. CVS Corp. et al.*, Judicial
17 Council Coordination Proceeding No. 4539.

18 8. To date, I have incurred approximately 9.20 hours in connection with the litigation
19 of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred to date.
20 Prior to January 1, 2024, my hourly rate in class and representative actions was \$750.00 per hour.
21 Accordingly, the total lodestar for my hours will be approximately \$6,900 (9.20 hours x \$750).

22 9. Since at least 2020, I have been approved at an hourly rate of \$750.00 per hour by
23 various Courts, in a number of matters, including *Hernandez v. Wells Fargo Bank*, Santa Clara
24 County Superior Court Case No. 16CV299319, *Carrillo v. New Balance Athletics, Inc.*, Santa
25 Clara County Superior Court Case No. 19CV352469; *Ramirez v. Walgreen Co.*, United States
26 District Court, Northern District of California Case No. 18-cv-03921-EJD, *Chavez v. Converse,*
27 *Inc.*, United States District Court, Northern District of California Case No. 15-cv-03746-NC;
28 *Foster v. Schindler Elevator Corporation*, Alameda County Superior Court Case No.

1 RG19029640; *Foaad Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No.
2 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No.
3 BC720144; *Mary Della Maggiora v. Watsonville Community Hospital*, Santa Cruz County
4 Superior Court Case No. 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino
5 County Superior Court Case No. CIVDS1823132; *Michael Randolph v. Pacific Racing*
6 *Association*, Alameda County Superior Court Case No. RG18908139; *Markham v. Quik Stop*
7 *Markets, Inc.*, Santa Clara Superior Court Case No.19CV341582; *Siron v. Raypak, Inc.*, Ventura
8 Superior Court Case No. 56-2019-005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San
9 Bernardino Superior Court Case No. CIVDS1828867, and *Prexxie Pascual and Arturo Fonseca v.*
10 *Satellite Healthcare, Inc.*, Santa Clara Superior Court Case No. 19CV345211.

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

13 Executed on March 28, 2024, at Los Angeles, California.

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Larry W. Lee

EXHIBIT A

Gilbert v. Central California Baking Company
Larry W. Lee Time and Task Chart

Hours	Description of Work
1.00	Review and edit Complaint.
2.50	Review and edit mediation brief.
2.20	Review and edit Settlement Agreement.
.80	Review and edit Motion for Preliminary Approval
2.70	Review and edit Motion for Final Approval and supporting declarations.
9.20	TOTAL HOURS