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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST

RAMON SINGLEY, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

BLS LIMOUSINE SERVICE OF LOS
ANGELES, INC., a California corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: BC619822

(Assigned to the Honorable Kenneth R. Freeman,
Department 310)

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

Date: February 27, 2018
Time: 3:00 P.M.
Dept.: 310

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DECLARATION OF LARRY W. LEE

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 Ramon Singley ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. The merits of the settlement have been set forth in detail in Plaintiff's Motion for Preliminary Approval, and will not be repeated herein.

3. The Court granted preliminary approval of this class action settlement and ordered that the approved notice be sent to class members pursuant to Court order. The Court-approved notice was provided to class members pursuant to this Court's order. Based on the responses of Class Members, Class Counsel seek final approval of class action settlement and disbursement of funds to class members, award of attorney's fees and costs, and Class Representative's Enhancement.

4. Class Counsel engaged in significant investigation before settling. During the course of this litigation, Plaintiff sought information pertaining to not only Plaintiff, but also the putative class members such as identifying the number of class members, their payroll data, as well as Defendant's employment and wage payment written policies and procedures.

5. The settlement was the product of arms-length negotiation between highly able and experienced attorneys on both sides, possessed of the relevant data and extensive legal research which they had carefully analyzed. It was only after the review of such data and an analysis of the potential liability did the Parties engage in settlement discussions and reach the current settlement.

6. Class Counsel supports the settlement as fair, reasonable and adequate, and in the best interest of the Class Members as a whole.

7. For these reasons, Class Counsel ask that based on the papers and supporting documents and declarations that final approval be granted in this matter and that the Court also

1 awards Class Counsel's request for attorney's fees, litigation costs, and for the enhancements to
2 the Class Representatives.

3 8. I have spent approximately 83 hours of work on this case. This includes time
4 spent researching the arbitration issues in this case, analyzing the policies and class payroll data,
5 and engaging in settlement activities. I also anticipate spending an additional 15 hours traveling
6 to and attending the final approval motion, conferring and reviewing e-mails and other written
7 communications with counsel for Defendant, the Claims Administrator, and class members
8 regarding post final approval matters, including payments and related issues.

9 9. The total lodestar for my hours will be approximately \$63,700.00 based on an
10 hourly rate of \$650.00 per hour. I have been approved at this hourly rate, including by various
11 Courts since 2015, including the following matters: *Sison v. Headway Technologies*, Santa Clara
12 Superior Court Case No. 1-13-CV-254591; *Ortegon-Ramirez v. Cedar Fair*, Santa Clara
13 Superior Court Case No. 1-13-CV-254098; *Parr v. Golden State Overnight*, Alameda Superior
14 Court Case No. RG12618103; *Barrera v. Home Depot*, Northern District of California Case No.
15 C 12 5199; *Chavez v. PVH*, Northern District of California Case Case No. C 13-01797;
16 *Capulong v. Empres Healthcare*, Monterey County Superior Court Case No. M131202; and
17 *Ramirez v. Staffing Solutions*, Orange County Superior Court Case No. 30-2014-00703086-CU-
18 OE-CXC.

19 10. Based on my personal lodestar, and the lodestar of Mr. Magee, the total lodestar
20 incurred by my firm will be approximately \$107,950.00.

21 11. To date, my firm has incurred costs in the amount of \$4,714.78. Such costs
22 include, but are not limited to, filing fees, postage and messenger charges, copy costs, and
23 service fees. Attached to my declaration as Exhibit A is a cost report listing all the costs incurred
24 by Class Counsel in litigating this matter.

25 12. I am one of the primary attorneys on this matter. My qualifications are as
26 follows: I received my J.D. from Arizona State University College of Law in 2003. During law
27 school, I was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated
28 cum laude from Arizona State University College of Law in the top 10% of my class. While I

1 was in law school, I was the Associate Managing Editor of the Arizona State University College
2 of Law, Law Journal. Upon graduation, I practiced law as an associate at the Los Angeles
3 County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment
4 defense law firm that represents a significant number of Fortune 500 companies.

5 13. My firm's primary focus is employment law. I have handled a number of wage
6 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
7 encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the
8 San Francisco County Superior Courts, the San Diego County Superior Courts, and the United
9 States District Courts for the Central, Eastern and Northern Districts of California.

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

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

24 Executed on this 26th day of January, 2018 at Los Angeles, California.

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27 Larry W. Lee
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EXHIBIT A

1/24/2018
9:49 AM

DIVERSITY LAW GROUP
Slip Listing

Page 1

Selection Criteria

Slip Classification Open
Client (hand select) Include: Singley, II, Ramon v. BLS
Slip Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
45808	EXP	Larry W. Lee	1	13.48	13.48
2/29/2016		Postage			
WIP		Singley, II, Ramon v. BLS			
Postage					
46440	EXP	Olympia	1	309.00	309.00
5/10/2016		Atty Service			
WIP		Singley, II, Ramon v. BLS			
Attorney Service					
46320	EXP	Olympia	1	1435.00	1435.00
5/11/2016		Atty Service			
WIP		Singley, II, Ramon v. BLS			
Attorney Service					
46775	EXP	Olympia	58	0.25	14.50
6/30/2016		Photocopies			
WIP		Singley, II, Ramon v. BLS			
Photocopies					
46776	EXP	Olympia	1	0.94	0.94
6/30/2016		Postage			
WIP		Singley, II, Ramon v. BLS			
Postage					
47086	EXP	Olympia	20	0.25	5.00
8/16/2016		Photocopies			
WIP		Singley, II, Ramon v. BLS			
Photocopies					
47158	EXP	Olympia	1	35.25	35.25
8/16/2016		Atty Service			
WIP		Singley, II, Ramon v. BLS			
Attorney Service					
47221	EXP	Olympia	1	0.47	0.47
8/31/2016		Postage			
WIP		Singley, II, Ramon v. BLS			
Postage					

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Slip Listing

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
47748	EXP	Olympia	1	92.40	92.40
11/21/2016		Court fees			
WIP		Singley, II, Ramon v. BLS			
Case Anywhere					
48439	EXP	Olympia	1	120.00	120.00
2/21/2017		Court fees			
WIP		Singley, II, Ramon v. BLS			
Case Anywhere					
48491	EXP	Olympia	1	20.00	20.00
2/27/2017		Atty Service			
WIP		Singley, II, Ramon v. BLS			
Attorney Service					
48592	EXP	Olympia	45	0.25	11.25
2/28/2017		Photocopies			
WIP		Singley, II, Ramon v. BLS			
Photocopies					
49086	EXP	Olympia	1	135.00	135.00
5/10/2017		Court fees			
WIP		Singley, II, Ramon v. BLS			
Case Anywhere					
49343	EXP	Olympia	1	122.75	122.75
5/24/2017		Atty Service			
WIP		Singley, II, Ramon v. BLS			
Attorney Service					
49418	EXP	Olympia	210	0.25	52.50
5/31/2017		Photocopies			
WIP		Singley, II, Ramon v. BLS			
Photocopies					
50314	EXP	Olympia	1	47.25	47.25
9/26/2017		Atty Service			
WIP		Singley, II, Ramon v. BLS			
Attorney Service					
50288	EXP	Olympia	270	0.25	67.50
9/30/2017		Photocopies			
WIP		Singley, II, Ramon v. BLS			
Photocopies					
51008	EXP	Larry W. Lee	1	1.50	1.50
10/17/2017		Other expenses			
WIP		Singley, II, Ramon v. BLS			
Parking					

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Slip Listing

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
51009 EXP 10/17/2017 WIP Parking	Larry W. Lee Other expenses Singley, II, Ramon v. BLS	1	1.00	1.00
50663 EXP 10/31/2017 WIP Photocopies	Olympia Photocopies Singley, II, Ramon v. BLS	111	0.25	27.75
51059 EXP 11/1/2017 WIP Attorney Service	Olympia Atty Service Singley, II, Ramon v. BLS	1	57.24	57.24
50614 EXP 11/8/2017 WIP Case Anywhere	Olympia Court fees Singley, II, Ramon v. BLS	1	145.00	145.00
51295 EXP 1/24/2018 WIP Filing and Service Fees	Olympia Court fees Singley, II, Ramon v. BLS	1	250.00	250.00
51296 EXP 1/24/2018 WIP Expert	Olympia Experts Singley, II, Ramon v. BLS	1	1750.00	1750.00
Grand Total	Billable Unbillable Total	0.00 0.00 0.00		4714.78 0.00 4714.78

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STATE OF CALIFORNIA]
COUNTY OF LOS ANGELES]ss.

On January 26, 2018, I served the following document(s) described as:
**DECLARATION OF LARRY W. LEE IN SUPPORT OF MOTION FOR FINAL
 APPROVAL OF CLASS ACTION SETTLEMENT** on the interested parties in this action as
 follows:

Attorney for Defendant BLS Limousine Service of Los Angeles, Inc.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on January 26, 2018, at Los Angeles, California.

~~Olympia Peña~~