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Attorneys for Plaintiff, the Class, and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

DESTINY KING, as an individual and on behalf of all others similarly situated,

Plaintiff,

vs.

AMF FOODS SPE LLC, a Delaware limited liability company; F & H PIZZA INC., a California corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 25CU010664C

(Assigned to the Hon. Wendy M. Behan, Dept. C-66)

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

Date: October 23, 2026
Time: 10:15 a.m.
Dept.: C-66

Action Filed: February 27, 2025
Trial Date: None Set

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, P.C., one of the attorneys of record for Plaintiff Destiny King ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. Based on my own independent investigation and evaluation, I am of opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class Action and PAGA Settlement and Release is fair, reasonable, and adequate and is in the best interests of the Settlement Class in light of all known facts and circumstances and the expenses and risks inherent in litigation.

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 the uncertainty and risks to Plaintiff involved in not prevailing on one or more of the causes of action or theories alleged in the operative Complaint and in 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 believe this settlement to be fair, adequate, and reasonable.

5. I am one of the primary attorneys on this matter. 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, Phleger & 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 national employment defense law firm that represents a significant number of Fortune 500 companies.

6. My firm's primary focus is employment law. I have handled a number of wage

and hour matters including class actions and multiple-plaintiff actions. I have a practice that encompasses cases in 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.

7. 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.

8. I have no conflicts with the Settlement Class and will adequately represent the Settlement Class.

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

Executed on this 1st day of October 2026, at Los Angeles, California.



Larry W. Lee