

Tuvia Korobkin, Esq. (SBN 268066)
tuvia@marqueelaw.com
Neil M. Larsen, Esq. (SBN 276490)
neil@marqueelaw.com
Nancy Goodes, Esq. (SBN 346529)
nancy@marqueelaw.com
MARQUEE LAW GROUP, A.P.C.
9100 Wilshire Boulevard, Suite 445 East Tower
Beverly Hills, California 90212
Tel: (310) 275-1844
Fax: (310) 275-1801

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

LESLIE LEON, on behalf of herself and all
others similarly situated,

Plaintiff,

vs.

SMBC MANUBANK, f.k.a.
MANUFACTURERS BANK, a California
corporation; and DOES 1 through 100,
Inclusive,

Defendants.

Case No. 25STCV00968

REPRESENTATIVE ACTION

*[Assigned for all purposes to the
Hon. William F. Highberger, Dept. SSC-10]*

**DECLARATION OF NEIL M. LARSEN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF SETTLEMENT OF
CLAIMS BROUGHT UNDER THE
PRIVATE ATTORNEYS GENERAL ACT
AND REASONABLE ATTORNEYS' FEES
AND COSTS**

Date:

Time:

Dept.: SSC-10

Action Filed: January 14, 2025

Trial date: None Set

DECLARATION OF NEIL M. LARSEN

I, NEIL M. LARSEN, declare as follows:

1. I am an attorney with Marquee Law Group, A Profession Corporation, attorneys for Plaintiff Leslie Leon (“Plaintiff”) and the Aggrieved Employees in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I am a 2010 graduate of Santa Clara University School of Law. I was admitted to the California State Bar in June 2011 after passing the bar examination on my first attempt. From January 2012 to February 2026, I worked as an attorney at several prominent employment law firms in Los Angeles County. The vast majority of my work at these firms focused on representing employees in wage and hour and wrongful termination actions, including wage and hour class actions. Although non-exhaustive, the types of work I performed at those firms include: conducting client intakes; performing pre-filing research and analysis; drafting complaints; attending court hearings; corresponding with opposing counsel; drafting and responding to written discovery; preparing for and taking and defending depositions; analyzing payroll and timekeeping records and employee handbooks; drafting and opposing a variety of motions including motions for summary judgment, motions for remand, demurrers and motions to dismiss, motions to compel, motions to quash, and motions for class certification; drafting mediation briefs and attending mediations; drafting long-form Settlement Agreements; drafting motions for preliminary and final settlement approval; and overseeing the claims and/or opt-out processes.

3. Since February 2026, I have worked at my current firm, Marquee Law Group. I am currently staffed on a significant number active wage and hour class actions in both state and federal court in which I play a significant role. The type of work I perform in my current position include, but are not limited: drafting class and representative action complaints, corresponding with clients and opposing counsel, drafting written discovery requests, drafting letters to the Labor & Workforce Development Agency, drafting mediation briefs and Settlement Agreements, analyzing payroll and timekeeping records and employee handbooks, conducting legal research,

1 and drafting motions and other pleadings.

2 4. The following is a non-exhaustive list of wage and hour class actions in which I
3 have been appointed as class counsel and/or played a significant role in prosecuting the litigation,
4 and which have received final approval: *Espinoza v. Vander-Bend Manufacturing, LLC*,
5 California Superior Court, Santa Clara County, Case No. 1-15-CV-283929 (granted final approval
6 of settlement on behalf of non-exempt employees in California); *Galeano v. American ETC., Inc.*
7 *dba Royal Laundry*, California Superior Court, San Mateo County, Case No. CIV534888 (granted
8 final approval of settlement on behalf of non-exempt employees in California); *Granciano v.*
9 *Southwind Foods, LLC, et al.*, California Superior Court, Los Angeles County, Case No.
10 BC538900 (granted final approval of settlement on behalf of non-exempt employees in
11 California); *Moppin v. Fastaff, LLC*, California Superior Court, Stanislaus County, Case No.
12 2020283 (granted final approval of settlement on behalf of non-exempt employees in California);
13 *Reyes v. Pentagon Technologies Group, Inc.*, California Superior Court, Alameda County, Case
14 No. HG15767111 (granted final approval of settlement on behalf of non-exempt employees in
15 California); *Salgado v. Safran USA, Inc.*, California Superior Court, Orange County, Case No.
16 30-2018-00969981-CU-OE-CXC; *Torres v. JJ Motorcars, Inc., et al.*, California Superior Court,
17 Los Angeles County, Case No. BC655446 (granted final approval of settlement on behalf of non-
18 exempt employees in California); *Mustapha v. Palm Springs Motors, Inc.*, California Superior
19 Court, Riverside County, Case No. RIC2003035 (granted final approval of settlement on behalf
20 of non-exempt employees in California); *Ceballos v. Flair Cleaners, Inc.*, California Superior
21 Court, Los Angeles County, Case No. 20STCV28196 (granted final approval of settlement on
22 behalf of non-exempt employees in California); *Hernandez v. Spectra Company*, California
23 Superior Court, Los Angeles County, Case No. 20STCV39910 (granted final approval of
24 settlement on behalf of non-exempt employees in California); *Bojorquez v. JIPC Ventures, Inc.*,
25 Case No. 37-2020-00029943-CU-OE-CTL, California Superior Court, San Diego County,
26 (granted final approval of settlement on behalf of non-exempt employees in California); *Agapito*
27 *v. La Verne Nursery, Inc.*, Case No. 56-2019-00527470-CU-OE-CTL, California Superior Court,
28 Ventura County (granted final approval of settlement on behalf of non-exempt employees in

California); *Whiteley v. Seco Manufacturing Company*, Case No. 192670, California Superior Court, Shasta County (granted final approval of settlement on behalf of non-exempt employees in California); *Carrillo v. Bikehub*, Case No. 20STCV28879, California Superior Court, Los Angeles County (granted final approval of settlement on behalf of non-exempt employees in California); *Macabulit v. DMC Power, Inc.*, Case No. 20STCV32034, California Superior Court, Los Angeles County (granted final approval of settlement on behalf of non-exempt employees in California); *Perez v. Edpo, LLC dba Energy Distribution Partners*, Case No. CU-22-00156, California Superior Court, San Benito County (granted final approval of settlement on behalf of non-exempt employees in California); *Reyes v. B.W. Hotel, LLC*, Case No. 22STCV34570, California Superior Court, Los Angeles County (granted final approval of settlement on behalf of non-exempt employees in California); *Green v. Union Rescue Mission*, Case No. 22STCV30872, California Superior Court, Los Angeles County (granted final approval of settlement on behalf of non-exempt employees in California); *Walters v. UFP Thronton, LLC*, Case No. STK-CV-UOE-2022-0012249, California Superior Court, San Joaquin County (granted final approval of settlement on behalf of non-exempt employees in California); *Rivera v. Copenhagen Sausage Garden, LLC*, Case No. 22CV04059, California Superior Court, Santa Barbara County (granted final approval of settlement on behalf of non-exempt employees in California); *Jimenez v. Delta View Farms, LLC*, Case No. VCU293548, California Superior Court, Tulare County (granted final approval of settlement on behalf of non-exempt employees in California); *Arce v. Bezsam, Inc.*, Case No. 37-2023-00018583-CU-OE-CTL, California Superior Court, San Diego County (granted final approval of settlement on behalf of non-exempt employees in California); *Martinez v. TRC Investments, LLC dba ServPro*, Case No. 23STCV03176, California Superior Court, Los Angeles County (granted final approval of settlement on behalf of non-exempt employees in California).

5. I have also moved to certify and have received an order certifying a class action in *Juarez v. Dignity Health*, California Superior Court, Los Angeles County, Case No. BC550950 (certifying a class of non-exempt employees involving s donning and doffing claim and other wage and hour claims); *Ibarra v. Artisan Screen Printing, Inc.*, California Superior Court, Los

1 Angeles County, Case No. BC644708 (certifying a class of non-exempt employees involving
2 meal period claims, rest period claims, rounding claims, and other wage and hour claims); and
3 *Raymond Barela v. Vicrez.com, LLC*, Los Angeles County Superior Court Case No.
4 22STCV28543 (certifying a class of non-exempt employees involving meal period claims, rest
5 period claims, reimbursement claims, wage statement claims, and waiting time penalty claims).

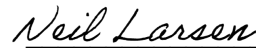
6 6. With particular relevance to this matter, I have served as counsel for the plaintiff
7 and aggrieved employees in numerous PAGA-only settlements, including but not limited to:

- 8 • *Negus v. Kashaco, Inc.*, Los Angeles County Superior Court, Case No.
9 25STCV17151, Hon. Gary D. Roberts presiding;
- 10 • *Cheung v. C2 Educational Systems, Inc.*, Santa Clara Superior Court, Case No.
11 23CV417697, Hon. Theodore C. Zayner presiding;
- 12 • *Bryan v. Orange Coast Title Company*, Santa Clara Superior Court, Case No.
13 22CV405756, Hon. Charles F. Adams presiding;
- 14 • *Abarca v. Circosta Iron & Metal Company*, San Francisco County Superior Court,
15 Case No. CGC-22-602245, Hon. Ethan P. Schulman presiding;
- 16 • *Alcantar Ruiz v. Greenheart Farms,, Inc.*, San Luis Obispo County Superior Court,
17 Case No. 21CV-0025, Hon. Rita Federman presiding;
- 18 • *Alexander v. Impossible Foods, Inc.*, San Mateo County Superior Court, Case No.
19 23-CIV-05278, Hon. Nicole S. Healy presiding;
- 20 • *Caston v. Exel, Inc. dba DHL Supply Chain*, Santa Clara Superior Court, Case No.
21 22CV409265, Hon. Theodore C. Zayner presiding;
- 22 • *Fistanic v. Hilltop Securities, Inc.*, Los Angeles County Superior Court, Case No.
23 20STCV47743, Hon. Kevin C. Brazile presiding;
- 24 • *Markley v. Easter Seals, Inc.*, Los Angeles County Superior Court, Case No.
25 20STCV18866, Hon. Steven J. Kleifeld presiding;
- 26 • *Martinez v. Doorking, Inc.*, Los Angeles County Superior Court, Case No.
27 20STCV48063, Hon. William F. Highberger presiding;
- 28

- *Ramirez v. Hobie Cat Company*, San Diego County Superior Court, Case No. 37-2020-00032735-CU-OE-CTL, Hon. Richard S. Whitney presiding;
- *Quintero v. Seidner-Miller, Inc.*, Los Angeles Superior Court, Case No. 20STCV36852, Hon. Kevin C. Brazile presiding.

7. As counsel for Plaintiff and the Aggrieved Employees in this case, I have been thoroughly involved in this case since I began my employment with Marquee Law Group. I believe the proposed Settlement is fair, reasonable and adequate for the Aggrieved Employees and the State of California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on June 30, 2026 at Beverly Hills, California.


Neil M. Larsen