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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

LAMEISHA GEORGE, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

WESTWAYS STAFFING SERVICES,
INC., a California corporation; and DOES
1 through 50, inclusive,

Defendants.

Case No.: CIVSB2212594
[Consolidated with: CIVSB2217699]

[Assigned for all purposes to the Hon. Jessica
Morgan, Dept. S-26]

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

Date: May 29, 2024
Time: 8:30 a.m.
Dept: S-26

Complaint Filed: June 16, 2022
Trial Date: None

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 Plaintiff Lameisha George (“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 Notice of Class Action Settlement (“Class Notice”) provided Class Members with my office’s contact information, where they could further seek information regarding the class settlement, leave questions for the Settlement Administrator, and update their address.

3. There were no objections to the amount of attorneys' fees or litigation costs that Class Counsel seek in this case and for which Plaintiff asks the Court for final approval.

4. The Stipulation of Class Action and PAGA Settlement and Release was the product of negotiation between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. Class Counsel engaged in extensive factual investigation before settling, including reviewing class data produced by Defendant relating to the number of wage statements issued to each putative class member. This allowed Plaintiff to conduct a full damage analysis.

5. The settlement in the case at bar warrants approval and carries a presumption of fairness. As previously noted in the application for Preliminary Approval, this current settlement was negotiated at arm's length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Class Members as a whole.

6. I have been approved as class counsel in numerous other wage/hour class actions that have been granted class certification and final approval.

7. To date, I have incurred approximately 41.6 hours in connection with the litigation of this lawsuit. Attached as **Exhibit A** is a true and correct copy of a summary of the hours worked on this action.

8. I also anticipate spending an additional 5 hours conferring and reviewing e-mails and other written communications with counsel for Defendant, the Settlement Administrator, and Class

Members regarding post final approval matters, including payments and related issues.

9. The total lodestar for my hours, including anticipated hours, will be approximately \$39,610.00 based on an hourly rate of \$850.00 per hour. I have been approved at an hourly rate of \$800.00 per hour by various courts, including: *Martinez and Acosta v. City of Hope National Medical Center, et al.*, San Bernardino County Superior Court Case No. CIVDS2015729; *Jaime Moen v. Genentech, Inc.*, San Diego County Superior Court Case No. 37-2021-00008619-CU-OE-CTL; *Murray v. Granite Wellness Centers et al.*, Nevada County Superior Court Case No. CU20-084680; *Smith, et al. v. Clean Harbors Environmental Services, Inc.*, Sacramento County Superior Court Case No. 34-2021-00292526; *Correa et al. v. FedEx Supply Chain, Inc.*, San Bernardino County Superior Court Case No. CIVDS2023369; *Meguro v. Silicon Valley Bank*, Santa Clara County Superior Court Case No. 20CV369854; and *Linaki v. Genji Pacific, LLC*, Alameda County Superior Court Case No. RG20074795. I recently increased my hourly rate to \$850.00 per hour. I have been approved at \$850.00 per hour in *Stephenson v. Healthcare Services, Inc.*, Orange County Superior Court Case No. 30-2019-01078609-CU-OE-CXC, *Lakey v. Poshmark, Inc.*, Santa Clara Superior Court, Case No. 22CV395084; and *Audycki v. Stanford Health Care*, Santa Clara Case No. 19CV347173.

10. 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.

11. 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, Orange County Superior Courts, San Francisco County Superior Courts, San Diego County Superior Courts, and the United States

District Courts for the Central, Eastern, Northern, and Southern Districts of California.

12. 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, Northern, and Southern 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.

13. I do not have any conflicts of interest with the proposed cy pres recipient, Legal Aid at Work.

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

Executed on this 6th day of May 2024, at Los Angeles, California.


Larry W. Lee

EXHIBIT A

George v Westways Staffing Services, Inc.
Larry W. Lee Time and Task Chart

Hours	Description of Work
8.1	Review client documents; research background of Defendant; research potential causes of action and viability of same
1.9	Review and revise complaints and PAGA letter
2.4	Review and revise opposition to demurrer and motion to strike; confer with co-counsel re same.
6.5	Review and revise first set of written discovery; review Defendant's responses and document production for same; meet and confer re same; review and revise Plaintiff's responses to first set of written discovery.
2.3	Further draft and revise notice of deposition of person most knowledgeable; confer with co-counsel re same.
2.5	Analyze and review deposition transcript of plaintiff; confer with co-counsel re impact on liability re same; strategize re litigation moving forward.
1.1	Further revise data requests for mediation; confer with co-counsel re same.
5.5	Review and revise mediation brief; legal research re same; review class data and damages analysis
2.7	Review and revise MOU; confer with counsel re same
4.1	Review and revise long form settlement documents
3.4	Review and revise Motion for Preliminary Approval and supporting documents
1.1	Review and revise Motion for Final Approval and supporting documents
41.6	TOTAL HOURS