

1 B. James Fitzpatrick (SBN: 129056)
2 Alison L. Baker (SBN: 193601)
3 **FITZPATRICK & SWANSTON**
4 555 S. Main Street
5 Salinas, CA 93901
6 Telephone: (831) 755-1311
7 Facsimile: (831) 755-1319

8 Larry W. Lee (SBN: 228175)
9 Kristen Agnew (SBN: 247656)
10 **DIVERSITY LAW GROUP, P.C.**
11 515 South Figueroa Street, Suite 1250
12 Los Angeles, California 90071
13 Telephone: (213) 488-6555
14 Facsimile: (213) 488-6554

15 Attorneys for Plaintiff Espiridion Gopar

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF SAN BENITO**

15 ESPIRIDION GOPAR, an individual and on
16 behalf of all others similarly situated,

17 Plaintiff,

18 TAYLOR FARMS RETAIL, INC.; and DOES 1
19 through 50, inclusive,

20 Defendant.

Case No. CU-24-00222

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFFS' MOTION
FOR APPROVAL OF PAGA
SETTLEMENT UNDER CALIFORNIA
LABOR CODE § 2698 ET SEQ.**

[Assigned for all purposes to The Honorable
Omar Rodriguez, Dept. 1]

Date: June 22, 2026
Time: 10:30 a.m.
Dept.: 1
Action Filed: September 11, 2024
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, counsel of record for Plaintiffs Silvia Armenta, Maria Castro Garcia, Enedina De La Torre, Espiridion Gopar, Socorro Sena, and Adolfo Esquivel Illu ("Plaintiffs" or "PAGA Representatives"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was retained based upon a contingency fee arrangement wherein PAGA Counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiffs failed to prevail on this case, counsel for Plaintiffs would have spent a significant amount of time, money and other resources without any benefit or return. In addition, had Plaintiffs also failed to prevail in the present case, Defendant would have been able to seek costs in connection with their defense of the case. To date, PAGA Counsel has not received any compensation for the amount of time and money invested in the case.

3. PAGA Counsel has zealously represented the interests of the aggrieved employees. The parties engaged in substantial written discovery in the related arbitrations, including the exchange of initial and supplemental disclosures and multiple sets of requests for production and special interrogatories. Taylor Farms further produced documents reflecting its policies and procedures concerning COVID-19 temperature screenings and mandatory call-in practices, together with videos capturing temperature screenings and employee timeclock activity, spreadsheets showing the dates and times of temperature screenings, individual employee time and payroll data, pre-shift text-message logs regarding shift start times, and new-hire training policy documents.

4. Based on the discovery and PAGA Counsel's investigation, I believe Plaintiffs' claims have substantial merit and that Plaintiffs could prevail at trial. At the same time, after considering the sharply disputed factual and legal issues presented in this litigation, the strengths and weaknesses of the claims and defenses, the manageability and proof issues that would arise at trial, the possibility that the Court could reduce any penalty award under PAGA, and the likelihood of further delay expense resulting from the pending appeal and any subsequent appeals, I have

1 concluded that the Settlement, for the consideration and on the terms set forth in the Settlement
2 Agreement, is fair, reasonable, and adequate, and in the best interests of the State and the Aggrieved
3 Employees.

4 5. My qualifications are as follows: I received my J.D. from Arizona State University
5 College of Law in 2003. During law school, I was a summer associate at the law firm of Brobeck,
6 Phleger & Harrison. I graduated cum laude from Arizona State University College of Law in the top
7 10% of my class. While I was in law school, I was the Associate Managing Editor of the Arizona
8 State University College of Law, Law Journal. Upon graduation, I practiced law as an associate at
9 the Los Angeles County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national
10 employment defense law firm that represents a significant number of Fortune 500 companies.

11 6. My primary practice is employment law. I have handled a number of wage and hour
12 matters including class actions and individual actions, on both plaintiff and defense sides. I have a
13 practice that encompasses cases throughout the State of California, including but not limited to the
14 Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County
15 Superior Courts, the San Diego County Superior Courts, and the United States District Courts for the
16 Central, Eastern, Northern, and Southern Districts of California. I have been named as Class Counsel
17 in a number of class actions that have been granted final approval by the Superior Courts of Los
18 Angeles County, Orange County, San Francisco County, Alameda County, Contra Costa County,
19 Monterey County, San Bernardino County, Santa Clara County, Sonoma County, and the United
20 States District Court for the Central, Eastern, and Northern Districts of California, including but not
21 limited to the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior
22 Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior
23 Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-
24 RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial
25 Council Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No.
26 BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539;
27 *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v. Community*
28 *Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No. 17CV003452;

1 *DirecTv Wage and Hour Cases*, Santa Clara Superior Court Judicial Council Coordination
2 Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior Court Case No.
3 RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court Case No. CV-18-558.

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

6 Executed this May 28, 2026, at Los Angeles, California.

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Larry W. Lee