

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Nick Rosenthal (State Bar No. 268297)
DIVERSITY LAW GROUP, A Professional Corporation
515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
Telephone: (213) 488-6555
Facsimile: (213) 488-6554

William L. Marder (State Bar No. 170131)
Polaris Law Group LLP
501 San Benito Street, Suite 200
Hollister, CA 95023
Telephone: (831) 531-4214
Facsimile: (831) 634-0333

Attorneys for Plaintiff and the Class

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

MAYRA RAMIREZ, as an individual and
on behalf of all similarly situated,

Plaintiffs,

vs.

SHERWOOD MANAGEMENT CO. INC.,
a California corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: BC609901

(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: April 10, 2018
Time: 2:00 P.M.
Dept.: 310

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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 Mayra Ramirez (“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 issued written discovery and 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 a mediation with mediator Steve Serratore. While the Parties were not able to reach a settlement at the mediation, the Parties continued further negotiations and investigation of the claims at issue.

6. Ultimately, as a result of such negotiations and investigation, the mediator issued a mediator's proposal that was accepted by both Parties.

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

3 8. For these reasons, Class Counsel ask that based on the papers and supporting
4 documents and declarations that final approval be granted in this matter and that the Court also
5 awards Class Counsel's request for attorney's fees, litigation costs, and for the enhancements to
6 the Class Representatives.

7 9. I have spent approximately 172 hours of work on this case. This includes time
8 spent drafting the various pleadings and discovery, significant meet and confers, analyzing the
9 policies and class payroll data, and engaging in settlement activities. I also anticipate spending
10 an additional 15 hours traveling to and attending the final approval motion, conferring and
11 reviewing e-mails and other written communications with counsel for Defendant, the Claims
12 Administrator, and class members regarding post final approval matters, including payments and
13 related issues.

14 10. The total lodestar for my hours will be approximately \$130,900.00 based on an
15 hourly rate of \$700.00 per hour. Since at least 2014, I have been approved at an hourly rate of
16 \$650.00 per hour by various Courts, including this Court, in a number of matters, including, but
17 not limited to, *Singley v. BLS*, Los Angeles Superior Court Case No. BC619822, *Ortegon-*
18 *Ramirez v. Cedar Fair*, Santa Clara Superior Court Case No. 1-13-CV-254098, *Parr v. Golden*
19 *State Overnight*, Alameda Superior Court Case No. RG12618103, *Pace v. Petsmart*, Central
20 District of California Case No. CV-13-500 DOC, *Castro v. Continental Airlines*, Central District
21 of California Case No. 2:14-cv-00169-SVW, and *Barrera v. Home Depot*, Case No. C 12 5199
22 LHK. As of 2018, I increased my hourly rate to \$700.00 per hour.

23 11. To date, my firm has incurred costs in the amount of \$12,470.56. Such costs
24 include, but are not limited to, filing fees, postage and messenger charges, copy costs, expert
25 fees, mediation fees, and service fees. Attached to my declaration as Exhibit A is a cost report
26 listing all the costs incurred by my office in litigating this matter.

27 12. I am one of the primary attorneys on this matter. My qualifications are as
28 follows: I received my J.D. from Arizona State University College of Law in 2003. During law

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

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

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

21
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 19th day of March, 2018 at Los Angeles, California.

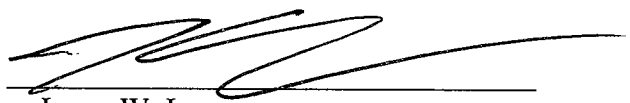
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27 Larry W. Lee
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EXHIBIT A

3/19/2018
10:04 AM

DIVERSITY LAW GROUP
Slip Listing

Page 1

Selection Criteria

Slip Classification Open
Client (hand select) Include: Ramirez v. Sherwood
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		
45880	EXP	Larry W. Lee	1	153.00	153.00
2/5/2016		Atty Service			
WIP		Ramirez v. Sherwood			
Attorney Service					
45860	EXP	Larry W. Lee	1	128.00	128.00
2/8/2016		Atty Service			
WIP		Ramirez v. Sherwood			
Attorney Service					
45645	EXP	Larry W. Lee	1	1435.00	1435.00
2/16/2016		Court fees			
WIP		Ramirez v. Sherwood			
Complaint					
45868	EXP	Larry W. Lee	1	53.75	53.75
2/16/2016		Atty Service			
WIP		Ramirez v. Sherwood			
Attorney Service					
45702	EXP	Larry W. Lee	1	1435.00	1435.00
2/29/2016		Atty Service			
WIP		Ramirez v. Sherwood			
Attorney Service (Monterey)					
45795	EXP	Larry W. Lee	56	0.25	14.00
2/29/2016		Photocopies			
WIP		Ramirez v. Sherwood			
Photocopies					
45796	EXP	Larry W. Lee	1	0.71	0.71
2/29/2016		Postage			
WIP		Ramirez v. Sherwood			
Postage					
46438	EXP	Olympia	1	22.00	22.00
5/9/2016		Atty Service			
WIP		Ramirez v. Sherwood			
Attorney Service					

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DIVERSITY LAW GROUP
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		
46764	EXP	Olympia	8	0.25	2.00
6/30/2016		Photocopies			
WIP		Ramirez v. Sherwood			
Photocopies					
46765	EXP	Olympia	1	0.47	0.47
6/30/2016		Postage			
WIP		Ramirez v. Sherwood			
Postage					
47484	EXP	Olympia	1	120.00	120.00
10/20/2016		Court fees			
WIP		Ramirez v. Sherwood			
Case Anywhere					
47694	EXP	Olympia	1	5000.00	5000.00
11/10/2016		Arbitrators			
WIP		Ramirez v. Sherwood			
Mediation					
48165	EXP	Olympia	22	0.25	5.50
12/31/2016		Photocopies			
WIP		Ramirez v. Sherwood			
Photocopies					
48233	EXP	Olympia	1	135.00	135.00
1/17/2017		Court fees			
WIP		Ramirez v. Sherwood			
Case Anywhere					
48823	EXP	Olympia	1	120.00	120.00
4/17/2017		Court fees			
WIP		Ramirez v. Sherwood			
Case Anywhere					
49480	EXP	Olympia	1	120.00	120.00
7/6/2017		Court fees			
WIP		Ramirez v. Sherwood			
Case Anywhere					
49773	EXP	Olympia	1	22.00	22.00
7/31/2017		Atty Service			
WIP		Ramirez v. Sherwood			
Attorney Service					
49874	EXP	Olympia	222	0.25	55.50
7/31/2017		Photocopies			
WIP		Ramirez v. Sherwood			
Photocopies					

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DIVERSITY LAW GROUP
Slip Listing

Page 3

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		
50208	EXP	Olympia	1	20.00	20.00
10/2/2017		Court fees			
WIP		Ramirez v. Sherwood			
Stip					
50326	EXP	Olympia	1	150.00	150.00
10/5/2017		Court fees			
WIP		Ramirez v. Sherwood			
Case Anywhere					
50656	EXP	Olympia	246	0.25	61.50
10/31/2017		Photocopies			
WIP		Ramirez v. Sherwood			
Photocopies					
50657	EXP	Olympia	1	0.46	0.46
10/31/2017		Postage			
WIP		Ramirez v. Sherwood			
Postage					
50860	EXP	Olympia	24	0.25	6.00
11/30/2017		Photocopies			
WIP		Ramirez v. Sherwood			
Photocopies					
50861	EXP	Olympia	1	0.67	0.67
11/30/2017		Postage			
WIP		Ramirez v. Sherwood			
Postage					
51229	EXP	Olympia	1	160.00	160.00
1/10/2018		Court fees			
WIP		Ramirez v. Sherwood			
Case Anywhere					
51935	EXP	Olympia	1	250.00	250.00
3/19/2018		Court fees			
WIP		Ramirez v. Sherwood			
Case Anywhere					
51936	EXP	Olympia	1	3000.00	3000.00
3/19/2018		Other expenses			
WIP		Ramirez v. Sherwood			
Expert					
Grand Total					
			0.00		12470.56
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STATE OF CALIFORNIA]
COUNTY OF LOS ANGELES]ss.
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On March 19, 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:

 X BY ELECTRONIC SERVICE VIA CASE ANYWHERE: Based on a court order I caused the above-entitled document(s) to be served through Case Anywhere at the website www.caseanywhere.com, addressed to all parties appearing on the electronic service list for the above-entitled case. The service transmission was reported as complete and a copy of the Case Anywhere Filing Receipt/Confirmation will be filed, deposited, or maintained with the original document(s) in this office.

Olympia Peña