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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO**

MICHAEL CONNER, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

RED WING BRANDS OF AMERICA,
INC., a Minnesota corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 22CIV03830

[Assigned for all purposes to the Hon. V. Raymond
Swope, Department 23]

**DECLARATION OF CHRISTINE S. LEE IN
SUPPORT OF PLAINTIFF’S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: August 12, 2024
Time: 3:00 P.M.
Dept.: 23

Action Filed: September 20, 2022
Trial Date: Not Set

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I, Christine S. Lee declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of Virginia, and am with the law firm Diversity Law Group, P.C., one of the attorneys of record for Plaintiff Michael Conner (“Plaintiff”). I have personal knowledge of the facts set forth below and am called to testify I could and would do so competently.

2. From the inception of the case, Plaintiff's Counsel have zealously represented the Plaintiff and the aggrieved employees. The settlement was obtained for the benefit of the aggrieved employees, as opposed to the individual Plaintiff.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the merits of the settlement, which is based on factoring in the inherent risks in drawn-out litigation, as well as the possibility of appeals.

4. After taking into account sharply disputed factual and legal issues involved in this case, the risks attending further prosecution, and the substantial benefits to be received from the compromise and settlement of the litigation, I have concluded that settlement on the terms set forth in the Settlement Agreement is appropriate and in the best interests of Plaintiff and aggrieved employees.

5. My qualifications are as follows: prior to attending law school, I had approximately 5 years of experience as a Litigation Paralegal. During law school, I was a Legal Intern for the U.S. Department of Veterans Affairs, a Judicial Intern for the Honorable James A. Meritt of the Circuit Court for Montgomery County, and a Summer Associate for the Law Firm of Rothman. I was also a Law Clerk for the Law Offices of Choi and Associates until I began my employment at Diversity Law Group, P.C. I received my JD from University of Maryland in 2021. Upon graduation from law school, I was admitted to the California Bar in

6. I am currently an associate at the law firm Diversity Law Group, P.C., an employment law firm that has handled numerous wage and hour class and individual actions, on plaintiff and defense sides. The firm currently has cases in Alameda Superior Court, San

1 Diego Superior Court, Santa Clara Superior Court, Sacramento Superior Court, Alameda
2 Superior Court, Monterey Superior Court, San Francisco Superior Court, San Joaquin Superior
3 Court, Kern County Superior Court, San Bernardino Superior Court, and the United States
4 District Courts for the Central, Northern, and Eastern Districts of California.

5 7. I am currently handling numerous wage and hour class action and PAGA
6 lawsuits, including *Marin v. Sea World LLC* (Case Number 37-2021-00047859-CU-OE-CTL,
7 Case Number Case Number 37-2022-00001083-CU-OE-CTL); *Marin v. HB Leisure, Inc.* (Lead
8 Case Number 37-2021-00048225-CU-OE-CTL); *McFarland v. Helix Electric, Inc.* (Case
9 Number 21CV391268, Case Number 22CV394399); *Ford v. The Silver F, Inc.* (Case Number
10 34-202100313161, Case Number 34-2022-00315620); *Cook-Farrar v. The RealReal, Inc.* (Case
11 Number CGC-22-597986, Case Number CGC-22-599036); *Brown v. HP Hood LLC* (Case
12 Number 34-2022-00315068, Case Number 34-2022-00318020); *Levingston v. Commerce
13 Distribution Company LLC* (Case Number 22STCV05730); *Deaver v. Blue Diamond Growers
14* (Case Number 34-2022-00316490, Case Number 34-2022-00319378); *Lang v. PNS Stores, Inc.*
15 (Case Number 34-2022-00318520); *White v. Cortech West Staffing, LLC* (Case Number STK-
16 CV-UOE-2022-0009807); *Chanley v. Growers Transplanting, Inc.* (Case Number
17 22CV002837); *Bolding v. Cardinal Financial Company* (Case Number CIVSB2206543); *Parra-
18 Marquez v. PRC DeSoto International, Inc.* (Case Number BCV-22-100704); *Khoshchin v. Atria
19 Management Company, LLC* (Case Number 2:22-cv-00916-TLN-KJN, Case Number 34-2022-
20 00322277-CU-OE-GDS); *Galvez v. Joseph J. Albanese, Inc.* (Case Number 22CV397197);
21 *Marsh v. Burberry* (Case Number 22CV016122); *Conner v. Red Wing Brands of America* (Case
22 Number 22-CIV-03830). I have also assisted the firm in numerous wage and hour class action
23 mediations. Most recently, I assisted the firm in successfully obtaining class certification by the
24 United States District Court, Central District of California in the case of *Sims v. QG Printing II,
25 LLC* (Case Number ED CV 20-1632-DMG (KKx)) and by the Santa Clara Superior Court in the
26 case of *Flores v. San Jose, LLC* (Case Number 20CV371772).

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

1 Executed on this 14th day of June 2024, at Los Angeles, California.

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3 Christine S. Lee