

B. James Fitzpatrick (SBN: 129056)
Laura L. Franklin (SBN: 282642)
FITZPATRICK & SWANSTON
555 S. Main Street
Salinas, CA 93901
Telephone: (831) 755-1311
Facsimile: (831) 755-1319

Larry W. Lee (SBN: 228175)
Christine S. Lee (SBN: 339947)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, California 90071
Telephone: (213) 488-6555
Facsimile: (213) 488-6554
lwlee@diversitylaw.com
christine@diversitylaw.com

Attorneys for Plaintiff,
CURTIS WHITE on behalf of himself and all similarly aggrieved employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN JOAQUIN

CURTIS WHITE on behalf of himself and
all similarly aggrieved employees,

Plaintiff,

v.

CORTECH WEST STAFFING, LLC;
THYSSENKRUPP MATERIALS NA, INC.;
THYSSENKRUPP SUPPLY CHAIN
SERVICES NA INC.; TESLA, INC. dba
TESLA MOTORS, INC.; and DOES 1
through 50, inclusive,

Defendants.

Case No. STK-CV-UOE-2023-0000029

(Assigned to the Hon. Erin Guy Castillo, Dept.
10B)

**DECLARATION OF CHRISTINE S. LEE
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT**

Date: January 14, 2025

Time: 9:00 A.M.

Dept.: 10B

Action Filed: October 24, 2022

Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

- 3
- 4
- 5
- 6

7
8
9
10
11

12
13
14
15

16
17
18
19

20

21

22
23
24

25
26
27
28

1 uncertainty and risks to Plaintiff in not prevailing at class certification and/or at trial, and the
2 possibility of appeals.

3 8. I have no conflicts of interest with the proposed *cy pres* recipient, Stockton Food
4 Bank.

5 9. My firm has a great deal of experience in wage and hour class action litigation
6 and has been approved as class counsel in a number of class actions.

7 10. I am one of the primary attorneys on this matter. My qualifications are as
8 follows: Prior to attending law school, I had approximately 5 years of experience as a
9 Litigation Paralegal. During law school, I was a Legal Intern for the U.S. Department of
10 Veterans Affairs, a Judicial Intern for the Honorable James A. Bonifant of the Circuit Court for
11 Montgomery County, and a Summer Associate for the Law Firm of Paley Rothman. I was also a
12 Law Clerk for the Law Offices of Choi and Associates until I began my employment at
13 Diversity Law Group, P.C. I received my JD from University of Baltimore in 2021. Upon
14 graduation from law school, I was admitted to the California Bar in 2021.

15 11. I am currently an associate at the law firm Diversity Law Group, P.C., an
16 employment law firm that has handled numerous wage and hour class and individual actions,
17 on both plaintiff and defense sides. The firm currently has cases in Alameda Superior Court,
18 San Diego Superior Court, Santa Clara Superior Court, Sacramento Superior Court, Alameda
19 Superior Court, Monterey Superior Court, San Francisco Superior Court, San Joaquin Superior
20 Court, Kern County Superior Court, San Bernardino Superior Court, and the United States
21 District Courts for the Central, Northern, and Eastern Districts of California.

22 12. I am currently handling numerous wage and hour class action and PAGA
23 lawsuits, including *Marin v. Sea World LLC* (Case Number 37-2021-00047859-CU-OE-CTL,
24 Case Number Case Number 37-2022-00001083-CU-OE-CTL); *Marin v. HB Leisure, Inc.*
25 (Lead Case Number 37-2021-00048225-CU-OE-CTL); *McFarland v. Helix Electric, Inc.*
26 (Case Number 21CV391268, Case Number 22CV394399); *Ford v. The Silver F, Inc.* (Case
27 Number 34-202100313161, Case Number 34-2022-00315620); *Cook-Farrar v. The RealReal,*
28 *Inc.* (Case Number CGC-22-597986, Case Number CGC-22-599036); *Brown v. HP Hood*

1 LLC (Case Number 34-2022-00315068, Case Number 34-2022-00318020); *Levingston v.*
2 *Commerce Distribution Company LLC* (Case Number 22STCV05730); *Deaver v. Blue*
3 *Diamond Growers* (Case Number 34-2022-00316490, Case Number 34-2022-00319378);
4 *Lang v. PNS Stores, Inc.* (Case Number 34-2022-00318520); *White v. Cortech West Staffing,*
5 *LLC* (Case Number STK-CV-UOE-2022-0009807); *Chanley v. Growers Transplanting, Inc.*
6 (Case Number 22CV002837); *Bolding v. Cardinal Financial Company* (Case Number
7 CIVSB2206543); *Parra-Marquez v. PRC DeSoto International, Inc.* (Case Number BCV-22-
8 100704); *Khoshchin v. Atria Management Company, LLC* (Case Number 2:22-cv-00916-TLN-
9 KJN, Case Number 34-2022-00322277-CU-OE-GDS); *Galvez v. Joseph J. Albanese, Inc.*
10 (Case Number 22CV397197); *Marsh v. Burberry* (Case Number 22CV016122); *Conner v.*
11 *Red Wing Brands of America* (Case Number 22-CIV-03830). I have also assisted the firm in
12 numerous wage and hour class action mediations. Most recently, I assisted the firm in
13 successfully obtaining class certification by the United States District Court, Central District
14 of California in the case of *Sims v. QG Printing II, LLC* (Case Number ED CV 20-1632-DMG
15 (KKx)) and by the Santa Clara Superior Court in the case of *Flores v. San Jose, LLC* (Case
16 Number 20CV371772).

17 **NOTICE TO THE LWDA**

18 13. On August 12, 2024, my office uploaded the Order Granting Plaintiff's Motion
19 for Preliminary Approval of Class and Representative Action Settlement to the LWDA's
20 website. Attached as **Exhibit A** is a true and correct copy of the upload confirmation.

21 14. Concurrent with the filing of the Motion for Final Approval of Class and
22 Representative Action Settlement, my office uploaded the motion and proposed order to the
23 LWDA's website. Attached as **Exhibit B** is a true and correct copy of the upload
24 confirmation.

25 //

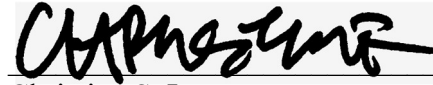
26 //

27 //

28 //

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

3 Executed on this 19th day of December 2024, at Los Angeles, California.

4 

5 Christine S. Lee
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

From: [DIR PAGA Unit](#)
To: [Olympia Pena](#)
Subject: Thank you for your Court Order or Judgment Submission
Date: Monday, August 12, 2024 5:30:46 PM

08/12/2024 05:30:30 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Court Order or Judgment

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

EXHIBIT B