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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 LARRY W. 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

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1 Angeles County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national
2 employment defense law firm that represents a significant number of Fortune 500 companies.

3 6. My firm's primary focus is employment law. I have handled a number of wage
4 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
5 encompasses cases throughout the State of California, including but not limited to the Los
6 Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County
7 Superior Courts, the San Diego County Superior Courts, and the United States District Courts
8 for the Central, Eastern, Northern, and Southern Districts of California.

9 7. I have been named as class counsel in a number of class actions that have been
10 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
11 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
12 County, Santa Clara County, Sonoma County, and other counties, as well as the United States
13 District Court for the Central, Eastern, and Northern Districts of California, including but not
14 limited to the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
15 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange
16 County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California
17 Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County
18 Superior Court, Judicial Council Coordination Proceeding No. 4480; *Hernandez v. CVS Corp.*
19 *et al.*, Judicial Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito
20 County Superior Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey*
21 *Peninsula*, Monterey County Superior Court Case No. 17CV003452; *DirecTv Wage and Hour*
22 *Cases*, Santa Clara Superior Court Judicial Council Coordination Proceeding No. 4850; *Perez*
23 *v. Standard Drywall, Inc.*, Alameda County Superior Court Case No. RG15761142; and *Davis*
24 *v. Nugget Market, Inc.*, Yolo County Superior Court Case No. CV-18-558.

25 8. I have no conflicts with Stockton Food Bank, which is the *cy pres* beneficiary of
26 this proposed settlement.

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 19th day of December 2024, at Los Angeles, California.

2 
3 _____
4 Larry W. Lee

EXHIBIT A

12/12/2024
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DIVERSITY LAW GROUP
Slip Listing

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Selection Criteria

Slip.Classification Open
Client (hand select) Include: White, Curtis v. Cortech PAGA
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		
71597	EXP	Erika Mejia	1	456.75	456.75
3/16/2022		Court fees			
WIP		White, Curtis v. Cortech PAG			
San Joaquin E Filing - Complaint					
71379	EXP	Erika Mejia	1	83.60	83.60
3/17/2022		Atty Service			
WIP		White, Curtis v. Cortech PAG			
Attorney Service - Complaint Service					
71380	EXP	Erika Mejia	1	50.50	50.50
3/17/2022		Atty Service			
WIP		White, Curtis v. Cortech PAG			
Attorney Service - Complaint Service					
71381	EXP	Erika Mejia	1	105.10	105.10
3/17/2022		Atty Service			
WIP		White, Curtis v. Cortech PAG			
Attorney Service - Complaint Service					
71378	EXP	Erika Mejia	1	96.10	96.10
3/17/2022		Atty Service			
WIP		White, Curtis v. Cortech PAG			
Attorney Service - Complaint Service					
73442	EXP	Christine S. Lee	1	6.09	6.09
10/3/2022		Telephone			
WIP		White, Curtis v. Cortech PAG			
Conference Calls					
73246	EXP	Christine S. Lee	1	8.00	8.00
10/5/2022		Other travel			
WIP		White, Curtis v. Cortech PAG			
Travel					
73249	EXP	Christine S. Lee	1	405.97	405.97
10/5/2022		Other travel			
WIP		White, Curtis v. Cortech PAG			
Travel					

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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		
73248	EXP	Christine S. Lee	1	7.61	7.61
10/5/2022		Meals			
WIP		White, Curtis v. Cortech PAG			
Meal					
73247	EXP	Christine S. Lee	1	66.85	66.85
10/5/2022		Other travel			
WIP		White, Curtis v. Cortech PAG			
Travel					
73245	EXP	Christine S. Lee	1	4.15	4.15
10/5/2022		Meals			
WIP		White, Curtis v. Cortech PAG			
Meal					
73244	EXP	Christine S. Lee	1	27.43	27.43
10/5/2022		Other travel			
WIP		White, Curtis v. Cortech PAG			
Travel					
73243	EXP	Christine S. Lee	1	178.39	178.39
10/5/2022		Other travel			
WIP		White, Curtis v. Cortech PAG			
Travel					
73242	EXP	Christine S. Lee	1	27.82	27.82
10/5/2022		Other travel			
WIP		White, Curtis v. Cortech PAG			
Travel					
73241	EXP	Christine S. Lee	1	22.82	22.82
10/5/2022		Other travel			
WIP		White, Curtis v. Cortech PAG			
Travel					
73718	EXP	Olympia	20	0.25	5.00
10/31/2022		Photocopies			
WIP		White, Curtis v. Cortech PAG			
Photocopies					
73719	EXP	Olympia	1	28.80	28.80
10/31/2022		Postage			
WIP		White, Curtis v. Cortech PAG			
Postage					
73969	EXP	Erika Mejia	1	456.75	456.75
1/4/2023		Court fees			
WIP		White, Curtis v. Cortech PAG			
San Joaquin E Filing - Complaint					

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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		
74286	EXP	Erika Mejia	1	10.50	10.50
1/30/2023		Court fees			
WIP		White, Curtis v. Cortech PAG			
TrueFiling - Respondent's Civil Appeal					
Mediation Statement					
77824	EXP	Erika Mejia	1	21.00	21.00
3/22/2024		Court fees			
WIP		White, Curtis v. Cortech PAG			
San Joaquin E Filing - Stip to Cont CMC					
78228	EXP	Erika Mejia	1	21.00	21.00
5/7/2024		Court fees			
WIP		White, Curtis v. Cortech PAG			
San Joaquin EFiling - Stip					
78629	EXP	Linda Lee	1	63.00	63.00
6/25/2024		Court fees			
WIP		White, Curtis v. Cortech PAG			
San Joaquin EFiling - MPA					
78638	EXP	Erika Mejia	1	21.00	21.00
6/26/2024		Court fees			
WIP		White, Curtis v. Cortech PAG			
San Joaquin E Filing - Stip to Cont CMC					
80037	EXP	Christine S. Lee	1	250.00	250.00
12/12/2024		Other expenses			
WIP		White, Curtis v. Cortech PAG			
MFA					
Grand Total					
Billable			0.00		2424.23
Unbillable			0.00		0.00
Total			0.00		2424.23

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Selection Criteria

Slip.Classification Open
Client (hand select) Include: White, Curtis v. Cortech CA
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		
73520	EXP	Erika Mejia	1	1757.54	1757.54
10/24/2022		Atty Service			
WIP		White, Curtis v. Cortech CA			
Attorney Service - Complaint					
73418	EXP	Mariana Becerra	1	75.00	75.00
10/25/2022		Court fees			
WIP		White, Curtis v. Cortech CA			
LWDA					
73829	EXP	Erika Mejia	1	57.25	57.25
11/16/2022		Atty Service			
WIP		White, Curtis v. Cortech CA			
Attorney Service - Complaint Service					
73832	EXP	Erika Mejia	1	116.11	116.11
11/16/2022		Atty Service			
WIP		White, Curtis v. Cortech CA			
Attorney Service - Complaint Service					
73828	EXP	Erika Mejia	1	92.99	92.99
11/16/2022		Atty Service			
WIP		White, Curtis v. Cortech CA			
Attorney Service - Complaint Service					
73827	EXP	Erika Mejia	1	107.74	107.74
11/16/2022		Atty Service			
WIP		White, Curtis v. Cortech CA			
Attorney Service - Complaint Service					
74083	EXP	Erika Mejia	1	71.75	71.75
12/2/2022		Atty Service			
WIP		White, Curtis v. Cortech CA			
Attorney Service - POS					
73968	EXP	Erika Mejia	1	456.75	456.75
1/3/2023		Court fees			
WIP		White, Curtis v. Cortech CA			
[No description]					

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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		
76176	EXP	Olympia	1	3987.50	3987.50
9/14/2023		Arbitrators			
WIP		White, Curtis v. Cortech CA			
JAMS Mediation					
76506	EXP	Olympia	1	500.00	500.00
11/3/2023		Arbitrators			
WIP		White, Curtis v. Cortech CA			
JAMS Mediation					
76612	EXP	Olympia	1	0.63	0.63
11/10/2023		Postage			
WIP		White, Curtis v. Cortech CA			
Postage					
Grand Total					
			Billable	0.00	7223.26
			Unbillable	0.00	0.00
			Total	0.00	7223.26