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SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

SIMON EDEZA CAMPANA,

Plaintiff,

v.

VISTA VERDE LABOR, INC.; and DOES 1
through 50, inclusive,

Defendants.

Case No. 23CV000638

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: March 13, 2026

Time: 8:30 A.M.

Dept.: 15

1 I, Larry W. Lee, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and am with the law firm Diversity Law Group, counsel of record for Plaintiffs
4 Simon Edeza Campana, Magdalena Adame Quezada, and Maria Isabel Perez Gomez
5 (“Plaintiffs”). I have personal knowledge of the facts set forth below and if called to testify I
6 could and would do so competently.

7 2. I am one of the primary attorneys on this matter. Based on my independent
8 investigation and assessment, I believe the settlement described in the Joint Stipulation of
9 Class and Representative Action Settlement (“Agreement” or “Settlement Agreement”) is fair,
10 reasonable, and adequate. The terms of the Agreement were reached through arms’ length
11 negotiations—between skilled and experienced counsel on both sides, who had access to and
12 thoroughly analyzed the relevant data and legal issues— including a full-day private
13 mediation. The Settlement reflects a reasoned and informed compromise that accounts for the
14 material risks of adverse rulings at summary judgment, denial or loss of class certification,
15 reduced recoverable damages or penalties, delay through post-trial motions and appeals, and
16 challenges in collecting any judgment.

17 3. All work performed by Diversity Law on this matter was done on a contingency
18 basis. The Firm has received no compensation for the time invested or expenses incurred in
19 litigating this case. The Firm has prosecuted this litigation up to this point, taking the risk that
20 it ultimately would be faced with not receiving any compensation for our work.

21 4. I am familiar with most aspects of this case and tasks undertaken by the various
22 members of the Firm in litigating this case. I have been assisted by attorneys Nicholas
23 Rosenthal and Kristen M. Agnew. Mr. Rosenthal, Ms. Agnew and I are experienced and well-
24 qualified class action litigators who have litigated many wage and hour class actions and have
25 each been certified as class counsel in numerous other class actions, particularly wage and
26 hour class actions.

27 5. Since the outset of this case, Class Counsel has conducted a thorough factual
28 investigation and in-depth legal analysis. Attorneys at the Firm have devoted 267.90 hours on

1 this case, which includes anticipated future time attending the hearing, responding to inquiries
2 from Class Members, preparing reports to the court, and any other issues that may arise during
3 the settlement payout period. Attached hereto as **Exhibit A** is a detailed summary of tasks and
4 hours spent by the Firm's attorneys in litigating this case.

5 6. This case required an unusual amount of work after preliminary approval to
6 reconcile class data, implement a workable notice process, and ensure Class Members received
7 effective notice consistent with the Court's order. Vista Verde's workforce is predominantly
8 transitory and temporary; many putative Class Members worked for short durations. These
9 circumstances created significant practical and data-related obstacles to providing notice,
10 necessitating extensive meet and confer efforts, an *ex parte* application and hearing, and
11 multiple continuances of the final approval hearing.

12 7. The hourly rate for attorneys staffed on this matter ranges from \$800 to \$900 per
13 hour. I was approved at an hourly rate of \$900 in the matter of *Jose Valencia v. Sentinel*
14 *Transportation, LLC*, Santa Barbara Superior Court Case No. 22CV00951; *Robert Jordan v.*
15 *Mondelez Global LLC*, San Bernardino Superior Court Case No. CIVSB2202758; and *In re*
16 *Humano Wage and Hour Cases*, Judicial Council Coordination Proceeding Case No. 5240. I
17 have previously been approved at an hourly rate of \$850 by various courts in a number of
18 matters, including most recently in *Audycki v. Stanford Health Care*, Santa Clara Superior
19 Court Case No. 19CV347173 and *Palomino v. Northrop Grumman Systems Corporation*,
20 Santa Clara Superior Court Case No. 19CV345534. Similarly, Ms. Agnew and Mr. Rosenthal
21 have been approved at an hourly rate of \$800 in the matters of *Robert Jordan v. Mondelez*
22 *Global, LLC*, San Bernardino County Superior Court Case No. CIVSB2202758; *Alexis Tristan*
23 *v. American Homes 4 Rent, L.P.*, Los Angeles County Superior Court Case No.
24 23STCV17006; and *Jose Valencia v. Sentinel Transportation, LLC*, Santa Barbara Superior
25 Court Case No. 22CV00951; *In re Humano Wage and Hour Cases*, Judicial Council
26 Coordination Proceeding Case No. 5240; *Justin Bui v. The Ranch Steakhouse and Saloon, Inc.*
27 *and RGB Systems, Inc.*, Santa Clara Superior Court Case No. 24CV439149; and *Palomino v.*
28 *Northrop Grumman Systems Corporation*, Santa Clara Superior Court Case No. 19CV345534.

1 8. In this motion, Class Counsel requests a reduced attorney hourly rate of \$595.00.
2 Accordingly, the total lodestar for the Firm's hours will be approximately \$159,400.50 based
3 on an hourly rate of \$595.00 per hour [267.90 hours x \$595.00].

4 9. At the time the Parties negotiated the Settlement Agreement, I did not have a
5 final tally of the litigation costs incurred to date. As such, the Parties included a maximum
6 amount that could be attributed to costs under the settlement. To date, Diversity Law Group
7 has incurred costs in the amount of \$43.95 litigation related expenses. Attached hereto as
8 **Exhibit B** is a true and correct copy of the cost report.

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

17 11. My firm's primary focus is employment law. I have handled a number of wage
18 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
19 encompasses cases throughout the State of California, including but not limited to the Los
20 Angeles Superior Court, Orange County Superior Court, San Francisco County Superior
21 Court, San Diego County Superior Court, and the United States District Courts for the Central,
22 Eastern, and Northern Districts of California.

23 12. I have been named as Class Counsel in a number of class actions that have been
24 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
25 Francisco County, and the United States District Court for the Central District of California,
26 including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
27 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange
28 County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California

1 Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County
2 Superior Court, Judicial Council Coordination Proceeding No. 4480; and *Hernandez v. CVS*
3 *Corp. et al.*, Judicial Council Coordination Proceeding No. 4539.

4 13. Neither I nor Diversity Law Group has any financial interest in, or other conflict
5 of interest with, the designated *cy pres* recipient, Watsonville Law Center.

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

8 This declaration was executed by me on February 19, 2026, in Los Angeles, California.

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10 Larry W. Lee
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EXHIBIT A

DIVERSITY LAW GROUP TIME & TASK SUMMARY

Simon Edeza Campana v. Vista Verde Labor, Inc.
Monterey County Superior Court Case No. 23CV000638

I. FACTUAL AND LEGAL INVESTIGATION

- Initial intake meeting and ongoing communications with Simon Edeza Campana.
- Initial intake meetings and ongoing communications with Magdalena Adame Quezada.
- Initial intake meetings and ongoing communications with Maria Isabel Perez Gomez.
- Legal research and analysis regarding theories of liability and probability of class certification; conferences with co-counsel regarding same.
- Legal research and analysis regarding joint employer liability for grower defendants; conferences with co-counsel regarding same.
- Research pertaining to financial condition of grower defendants and ability to satisfy judgment.

Attorney Hours: 31.50

II. PLEADINGS & MOTION PRACTICE

- Review Plaintiff Campana's PAGA Notice.
- Review, revise, and finalize the Complaint.
- Review, revise, and finalize the First Amended Complaint to add class claims.
- Review Vista Verde Labor, Inc.'s Answer to the First Amended Complaint.
- Review Notice of Related Case; review pleadings from related matter of *Pablo Ortiz Garcia et. al v. Vista Verder Labor Inc.*; conference with co-counsel regarding same.
- Conferences with counsel for *Garcia* regarding litigation strategy.
- Review, revise, and finalize the Second Amended Complaint for purpose of adding additional named plaintiffs and individual claims for discrimination and retaliation.
- Meet and confer with defense counsel regarding March 19, 2024 case management conference; prepare joint case management statement; appear at case management conference; review Court's minute order regarding same.
- Review Vista Verde Labor, Inc.'s Answer to the Second Amended Complaint.
- Review, revise, and finalize the Third Amended Complaint to add the grower defendants.
- Review Vista Verde Labor, Inc.'s Answer to the Third Amended Complaint.
- Meet and confer with defense counsel regarding continuing deadline to serve Third Amended Complaint on the grower defendants; draft and finalize stipulation to continue deadline to serve third amended complaint on the grower defendants; review court's order regarding same.
- Meet and confer with defense counsel regarding September 24, 2024 case management conference; prepare joint case management statement.
- Review notice of resetting September 24, 2024 hearing.
- Conference with defense counsel regarding January 21, 2025 case management conference; prepare joint case management statement.
- Draft and finalize Fourth Amended Complaint; draft and finalize stipulation for leave to file fourth amended complaint.

Attorney Hours: 31.20

DIVERSITY LAW GROUP TIME & TASK SUMMARY

Simon Edeza Campana v. Vista Verde Labor, Inc.
Monterey County Superior Court Case No. 23CV000638

III. DISCOVERY AND DOCUMENT ANALYSIS

- Conferences with co-counsel regarding discovery plan.
- Review and finalize special interrogatories (set one) & requests for production (sets one).
- Interview current and former Vista Verde employees regarding off-the-clock work and meal and rest period policies.
- Research and identify Vista Verde's grower clients; review payroll records for current and former Vista Verde employees to evaluate standing to pursue claims against grower clients.

Attorney Hours: 36.90

IV. MEDIATION & POST MEDIATION SETTLEMENT NEGOTIATIONS

- Extensive meet and confer with defense counsel regarding the participation of the grower defendants in mediation.
- Extensive meet and confer with defense counsel regarding the scope and sampling protocol for crew sheets, time records, and wage statements; confer with co-counsel regarding the same.
- Extensive meet and confer with defense counsel regarding informal production of class and PAGA data points for mediation.
- Review and analyze crew sheets, time records, and wage statements.
- Review and analyze Vista Verde's written payroll policies.
- Prepare class and PAGA exposure analysis; confer with co-counsel regarding assumptions, methodology, and damages models.
- Draft mediation statement; legal research and analysis regarding same; conferences with co-counsel regarding mediation strategy.
- Attend October 23, 2024 mediation; post-mediation conferences with co-counsel.
- Conferences with mediator Chris Panetta regarding post-mediation settlement negotiations.
- Draft and finalize memorandum of understanding ("MOU").
- Conferences with defense counsel regarding revisions to MOU.
- Draft and finalize the guarantee and tolling agreements; conferences with defense counsel regarding same.
- Draft Joint Stipulation of Class and Representative Action Settlement ("Settlement Agreement").
- Meet and confer with defense counsel regarding revisions to Settlement Agreement.

Attorney Hours: 79.00

V. MOTION FOR PRELIMINARY APPROVAL & RECONCILIATION OF CLASS

DATA ISSUES

- Prepare Motion for Preliminary Approval of Class and Representative Action Settlement, supporting attorney and client declarations, and proposed order.
- Conferences with co-counsel regarding approval process and revisions to Motion for Preliminary Approval.
- Review and analyze Order Granting Motion for Preliminary Approval; calendar deadlines; and coordinate next steps with co-counsel and settlement administrator.

DIVERSITY LAW GROUP TIME & TASK SUMMARY

Simon Edeza Campana v. Vista Verde Labor, Inc.
Monterey County Superior Court Case No. 23CV000638

- Conferences with settlement administrator regarding class size and workweek/pay-period calculations.
- Meet and confer with defense counsel to address data anomalies.
- Conferences with co-counsel regarding reconciliation of the class list and workweek calculations; confirm consistency with settlement terms.
- Conferences with settlement administrator and defense counsel regarding missing/invalid Social Security numbers and addresses, including procedures for skip tracing, and data correction protocols to ensure effective notice.
- Meet and confer with defense counsel regarding continuance of final approval hearing; review and finalize stipulation regarding same.
- Meet and confer with defense counsel regarding ex parte application to continue the final approval hearing; draft and finalize the ex parte application and supporting declaration(s); prepare for and appear at the ex parte hearing.
- Review and finalize class notice.

Attorney Hours: 63.90

VI. MOTION FOR FINAL APPROVAL

- Review opt-out report and related class member communications; conferences with counsel for class members who opted out.
- Draft and finalize Motion for Final Approval of Class Action Settlement, supporting attorney and client declarations, and proposed order.
- Conferences with settlement administrator declaration regarding notice process.
- Meet and confer with defense counsel regarding declaration and evidentiary support concerning worksite postings regarding class action settlement.
- Anticipated preparation for and attendance at hearing.
- Anticipated communications with settlement class members regarding settlement status and distribution timing, check re-issues and related administration issues.

Attorney Hours: 25.40

Total Attorney Hours: 267.90