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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MONTEREY

JASMIN JIMENEZ, on behalf of herself and all
similarly aggrieved employees,

Plaintiff,

vs.

SEA HOUSE SALINAS, LLC; OMAR
CAMPOS; SHAN BAO GUO; BAG O'CRAB,
INC.; SEA HOUSE SL LLC; BAG O CRAB MC
LLC; and DOES 3 through 50, inclusive,

Defendants.

Case No. 23CV000504

[Assigned to Hon. Thomas W. Wills, Dept. 15]

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

Date: June 27, 2025
Time: 8:30 a.m.
Department: 15

Complaint Filed: February 16, 2023
FAC Filed: June 5, 2023
SAC Filed: November 8, 2024

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

2 1. I am an attorney admitted to practice in the State of California and, with the law firm
3 Diversity Law Group, P.C., am counsel of record for Plaintiff. I make this declaration on the basis of my
4 own personal knowledge, except as to those matters stated on information and belief and, as to those
5 matters, I believe them to be true. If called as a witness, I could testify competently as to the facts stated
6 in this declaration.

7 2. The Notice of Class Action Settlement (“Class Notice”) provided Class Members with
8 my office’s contact information, where they could further seek information regarding the class
9 settlement, leave questions for the Administrator, and update their address.

10 3. There were no objections to the amount of attorneys’ fees or litigation costs that Class
11 Counsel seek in this case and for which Plaintiff asks the Court for final approval.

12 4. Class Counsel engaged in extensive factual investigation before settling, including the
13 exchange of extensive informal and formal discovery and class data. This allowed Plaintiff to conduct a
14 full damage analysis. The Agreement was the product of negotiation between highly able and
15 experienced attorneys on both sides who possessed the relevant data and extensive legal research which
16 they had carefully analyzed.

17 5. The settlement in the case at bar warrants approval and carries a presumption of fairness.
18 As previously noted in the application for Preliminary Approval, this current settlement was negotiated
19 at arm’s length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the
20 Class Members as a whole.

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

23 7. I am one of the primary attorneys on this matter. My qualifications are as follows: I
24 received my J.D. from Arizona State University College of Law in 2003. During law school, I was a
25 summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude from Arizona
26 State University College of Law in the top 10% of my class. While I was in law school, I was the
27 Associate Managing Editor of the Arizona State University College of Law, Law Journal. Upon
28 graduation, I practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash

1 Smoak & Stewart, P.C., a national employment defense law firm that represents a significant number of
2 Fortune 500 companies, including wage and hour class actions.

3 8. My firm's primary focus is employment law. I have handled a number of wage and hour
4 matters including class actions and individual actions, on both plaintiff and defense sides. I have a
5 practice that 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 Superior
7 Courts, the San Diego County Superior Courts, and the United States District Courts for the Central,
8 Eastern, Northern, and Southern Districts of California. I have been named as Class Counsel in a
9 number of class actions that have been granted final approval by the Superior Courts of Los Angeles
10 County, Orange County, San Francisco County, Alameda County, Contra Costa County, Monterey
11 County, San Bernardino County, Santa Clara County, Sonoma County, and the United States District
12 Court for the Central, Eastern, and Northern Districts of California.

13 9. My firm has incurred costs in the amount of \$135.00. The costs are all litigation related
14 costs, including filing fees. Attached hereto as **Exhibit A** is copy of the costs my firm has incurred in
15 connection with prosecution of this lawsuit.

16 10. To date, I have incurred approximately 40.3 hours in the prosecution of this matter.
17 Attached as **Exhibit B** is a summary of my hours and tasks on this matter.

18 11. Since at least 2020, I have been approved at an hourly rate of \$750.00 per hour by
19 various Courts, including this Court. Examples of these Courts include the following cases: *Hernandez*
20 *v. Wells Fargo Bank*, Santa Clara County Superior Court Case No. 16CV299319, *Carrillo v. New*
21 *Balance Athletics, Inc.*, Santa Clara County Superior Court Case No. 19CV352469; *Ramirez v.*
22 *Walgreen Co.*, United States District Court, Northern District of California Case No. 18-cv-03921-EJD,
23 *Chavez v. Converse, Inc.*, United States District Court, Northern District of California Case No. 15-cv-
24 03746-NC; *Foster v. Schindler Elevator Corporation*, Alameda County Superior Court Case No.
25 RG19029640; *Foaad Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No.
26 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No. BC720144;
27 *Mary Della Maggiora v. Watsonville Community Hospital*, Santa Cruz County Superior Court Case No.
28 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino County Superior Court Case

1 No.CIVDS1823132; *Michael Randolph v. Pacific Racing Association*, Alameda County Superior Court
2 Case No. RG18908139; *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court Case
3 No.19CV341582; *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-CU-OE-
4 VTA; *Carter v. Kline Services, Inc.*, San Bernardino Superior Court Case No. CIVDS1828867, and
5 *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara Superior Court Case No.
6 19CV345211.

7 12. I also have been approved at an hourly rate of \$800.00 per hour in *Davila v. Hayward*
8 *Sisters Hospital*, Alameda County Superior Court Case No. RG20074747; *McCarthy, et al. v. The Vons*
9 *Companies, Inc.*, San Bernardino County Superior Court Case No. CIVDS2021085; *Martinez and*
10 *Acosta v. City of Hope National Medical Center, et al.*, San Bernardino County Superior Court Case No.
11 CIVDS2015729; *Moen v. Genentech, Inc.*, San Diego County Superior Court Case No. 37-2021-
12 00008619-CU-OECTL; *Murray v. Granite Wellness Centers et al.*, Nevada County Superior Court Case
13 No. CU20-084680, and *Smith, et al. v. Clean Harbors Environmental Services, Inc.*, Sacramento County
14 Superior Court Case No. 34-2021-00292526.

15 13. Although I believe \$800.00 per hour is a reasonable rate for my services, as it has been
16 approved throughout California, in this motion, I request a reduced hourly rate of \$595.00, which
17 considers the jurisdiction where this Action was litigated. Accordingly, the total lodestar for my hours
18 will be approximately \$23,978.50 based on an hourly rate of \$595.00 per hour [40.3 hours x \$595.00 per
19 hour].

20 14. On February 22, 2025, Plaintiff uploaded the Order Granting Plaintiff's Motion for
21 Preliminary Approval of Class Action Settlement to the LWDA's website. Attached as **Exhibit C** is the
22 upload confirmation from the LWDA. Concurrent with the filing of this motion, Plaintiff also has
23 uploaded the final approval motion to the LWDA.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing is
25 true and correct. Executed this 3rd day of June 2025, at Los Angeles, California.

26 

27 _____
Larry W. Lee

EXHIBIT A



INVOICE

Diversity Law Group

515 South Figueroa Street, Suite 1250,
Los Angeles, California, 90071
lwlee@diversitylaw.com

Invoice # 10072
Invoice Date 04/01/2025
Terms Upon Receipt
Due Date 04/01/2025
PO #

Subtotal: \$135.00
Discount: -\$0.00
Subtotal after Discount: \$135.00
Taxable Subtotal: \$135.00
Tax: \$0.00
Total: \$135.00

Details - Jimenez, Jasmin v. Sea House Salinas, LLC (10054.001)

Expenses

Category	Date	Expense Code	Description	Amount (\$)
	08/02/2024	E112 Court fees	Odyssey - Ex ParteOdyssey - Ex Parte	65.25
	01/08/2025	E112 Court fees	Odyssey - MPAOdyssey - MPA	65.25
Court Fees	01/15/2025		Odyssey - Amended SLY Decl	4.50
Subtotal:				\$135.00
Total:				\$135.00

EXHIBIT B

Time and Task Summary
for Jimenez v. Sea House Salinas, LLC et al.
Larry W. Lee

Description of Work	Hours
Review case history and client documents; confer with co-counsel re theories of liability	2.8
Review and revise first set of discovery requests	1.9
Review and revise Plaintiff's supplemental discovery responses; review documents in connection with same	3.3
Research corporate relationships between different entity stores	2.4
Review and revise Motion to Compel discovery and supporting documents; review opposition to same; review and revise reply brief re same	4.8
Review and revise ex parte to advance hearing re motion to compel; review opposition to same	2.2
Review Defendant's demurrer; legal research re opposition to same	2.7
Review and revise SAC	0.5
Review and revise depo notices for PMK and Guo	1.1
Review Campos depo transcript	1.6
Review and revise data request to be sent to Defense in advance of mediation.	1.4
Review data informally produced by Defendant; review damages calculation; confer with counsel regarding data	1.7
Review and revise mediation brief.	2.6
Review/revise MOU and confer with counsel	1.6
Review and revise long-form settlement agreement; confer with counsel regarding terms therein	2.4
Review and revise motion for preliminary approval of settlement, proposed order, and supporting documents; further review and revise same	3.8
Review and revise motion for final approval and supporting documents	3.5
TOTAL	40.3

EXHIBIT C

From: [DIR PAGA Unit](#)
To: [Olympia Pena](#)
Subject: Thank you for your Court Order or Judgment Submission
Date: Friday, February 21, 2025 5:10:53 PM

02/21/2025 05:10:37 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