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Attorneys for Plaintiffs, the Class, and Aggrieved Employees

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

GILBERT PARAMO and ROSEMARIE
SANTOS, as individuals and on behalf of
all others similarly situated,

Plaintiffs,

vs.

WEEE LOGISTICS INC., a Delaware
corporation; WEEE! INC., a Delaware
corporation; WEEE! LOGISTICS LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: STK-CV-UOE-2023-0001129

(Assigned to the Honorable Jayne Lee, Dept. 10C)

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

Date: October 25, 26 or November 7, 8, 10, 2023

Time: 9:00 a.m.

Dept.: 10C

Complaint Filed: February 9, 2023

Trial Date: None Set

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I, Larry W. Lee, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Diversity Law Group, counsel of record for Plaintiffs Gilbert Paramo and Rosemarie Santos (together, “Plaintiffs”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Class Counsel have zealously represented the interests of the Settlement Class. The settlement was obtained for the benefit of the Settlement Class, as opposed to the individual Class Representatives. Further, Class Counsel have been approved as class counsel on a number of prior cases, have litigated numerous other class action cases, and are competent to represent the Settlement Class.

3. Both Plaintiffs' and Defendants' counsel have a great deal of experience in wage and hour class action litigation. Plaintiffs' counsel have been approved as class counsel in a number of wage and hour class actions.

4. Based on my review of all the information, and based on my experience in class action litigation, I believe this settlement to be fair, adequate, and reasonable.

5. I was retained based upon a contingency fee arrangement wherein Plaintiffs' counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiffs failed to prevail in this case, counsel for Plaintiffs would have spent a significant amount of time, money and other resources without any benefit or return. In addition, had Plaintiffs also failed to prevail in the present case, Defendants would have been able to seek attorney's fees and costs in connection with their defense of the case.

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

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

3 7. 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 for
8 the Central, Eastern, Northern, and Southern Districts of California.

9 8. 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 County
16 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
17 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
18 Judicial Council Coordination Proceeding No. 4480; *Hernandez v. CVS Corp. et al.*, Judicial
19 Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior
20 Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey Peninsula*,
21 Monterey County Superior Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa
22 Clara Superior Court Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard*
23 *Drywall, Inc.*, Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget*
24 *Market, Inc.*, Yolo County Superior Court Case No. CV-18-558.

25 9. I have no conflicts with Legal Aid at Work, 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.

Executed on this 19th day of September 2023, at Los Angeles, California.



Larry W. Lee