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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
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: December 6, 2024

Time: 9:00 a.m.

Dept.: 10C

Complaint Filed: February 9, 2023

FAC Filed: August 1, 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. The Settlement Agreement was the product of negotiation between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. Plaintiff's Counsel engaged in extensive factual investigation and discovery before settling, including the exchange of informal discovery and necessary class data. This includes the number of putative class members employed by Defendants and through staffing agencies, number for former employees allegedly owed waiting time penalties, number of workweeks and pay periods at issue, applicable rates of pay for class members, a sample of time and pay records of the class members, as well as information pertaining to Defendants' payroll policies and practices at issue. The exchange of informal discovery allowed Class Counsel to conduct a full analysis of exposure.

3. The Parties engaged in arm's length negotiations at mediation with a highly experienced mediator, Gig Kyriacou, Esq. The Parties also engaged in post-mediation negotiations through the assistance of the mediator, after which settlement was reached.

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

5. I have been approved as class counsel in numerous other wage/hour class actions that have been granted class certification and final approval.

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*

1 from Arizona State University College of Law in the top 10% of my class. While I was in law
2 school, I was the Associate Managing Editor of the Arizona State University College of Law,
3 Law Journal. Upon graduation, I practiced law as an associate at the Los Angeles County offices
4 of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm that
5 represents a significant number of Fortune 500 companies.

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

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

28 9. I have no conflicts with Legal Aid at Work, which is the *cy pres* beneficiary of

1 this proposed settlement.

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

4 Executed on this 8th day of November 2024, at Los Angeles, California.

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Larry W. Lee