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Attorneys for Plaintiff Gerardo Polin

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CRUZ

GERARDO POLIN on behalf of himself
and all similarly aggrieved employees

Plaintiff,

v.

H.A. RIDER & SONS, INC.; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 23CV00417

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT
UNDER CALIFORNIA LABOR CODE §§ 2698
ET SEQ.**

Date: October 29, 2026
Time: 8:30 A.M.
Dept.: 10

Complaint Filed: February 17, 2023
Trial Date: None

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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 Plaintiff Gerardo Polin (“Plaintiff”). 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 Class.

3. I have spent significant time researching and pursuing the claims that have been alleged in this action. The Parties engaged in informal discovery and participated in the exchange of class and PAGA data and Defendants H.A. Rider & Sons, Inc., H.A. Rider & Sons, a general partnership, George Rider, Robert Rider, and Thomas Rider's (collectively "Defendants") pertinent policies and practices. Defendant provided Class Counsel with informal data and information pertaining to the number of putative class members, number of pay periods at issue, data pertaining to the aggrieved employees, as well as time and payroll records. Based on my review of all the documents and information, and based on my experience in class action litigation, I believe this settlement to be fair, adequate, and reasonable. This opinion is based on several factors, including the strengths and weaknesses of the claims and defenses, the substantial risks and uncertainty of continued litigation, the possibility that Plaintiff may not prevail on one or more theories of liability, the possibility that the Court could reduce any PAGA penalty award under Labor Code section 2699, subdivision (e)(2), the manageability and proof issues that would arise at trial, potential collectability issues associated with pursuing a substantially larger judgment, and the likelihood of further delay and expense through continued litigation and any appeals.

4. I was retained based upon a contingency fee arrangement wherein Class Counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. For example, my office has expended costs to file this instant action, effect service of process, and pay other litigation-related costs. Had Plaintiff failed to prevail in this case, counsel for Plaintiff would have spent a significant amount of time, money, and other resources without any benefit or return. In

1 addition, had Plaintiff also failed to prevail in the present case, Defendants would have been able
2 to seek attorney's fees and costs in connection with their defense of the case.

3 5. I am one of the primary attorneys on this matter. My qualifications are as follows:
4 I received my J.D. from Arizona State University College of Law in 2003. During law school, I
5 was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated *cum laude*
6 from Arizona State University College of Law in the top 10% of my class. While I was in law
7 school, I was the Associate Managing Editor of the Arizona State University College of Law, Law
8 Journal. Upon graduation, I practiced law as an associate at the Los Angeles County offices of
9 Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm that
10 represents a significant number of Fortune 500 companies.

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

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

1 Superior Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior
2 Court Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*,
3 Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo
4 County Superior Court Case No. CV-18-558.

5 8. My co-counsel and I will adequately represent the Class Members in this action. I
6 have no conflicts with the Class and will adequately represent the Class.

7 9. I do not have any conflicts with the proposed *cy pres* recipient Legal Aid at Work.

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

10 Executed on this 5th day of August 2026, at Los Angeles, California.

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13 Larry W. Lee
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