

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Nicholas Rosenthal (State Bar No. 268297)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

William L. Marder, Esq. (State Bar No. 170131)
Polaris Law Group LLP
501 San Benito Street, Suite 200
Hollister, CA 95023
Tel: (831) 531-4214
Fax: (831) 634-0333

Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SONOMA

JOSE VASQUEZ RUIZ, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

PERDUE FOODS, LLC., a Maryland
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: SCV 264649

(Assigned to the Honorable Patrick M. Broderick,
Dept. 16)

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFF JOSE VASQUEZ
RUIZ'S MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND PAGA
SETTLEMENT**

Date: TBD

Time: TBD

Dept.: 16

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

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 Named Plaintiff Masquez Ruiz ("Plaintiff"). I have personal knowledge of the facts set forth below and if to testify I could and would do so competently.

3. Both Class Counsel and defense counsel have a great deal of experience in wage and hour class action litigation. Class Counsel has been approved as class counsel on a number of prior cases, have litigated numerous other class action cases, and are competent to represent the Class.

5. I was retained based upon a contingency fee arrangement wherein Plaintiff's counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiff failed to prevail on these cases, counsel for Plaintiff would have spent a significant amount of time, money and other resources without any benefit or return. In addition, had Plaintiff also failed to prevail in the present cases, Defendant 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

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

5 7. My firm's primary focus is employment law. I have handled a number of wage
6 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
7 encompasses cases in the Los Angeles Superior Court, the Orange County Superior Court, Santa
8 Clara Superior Court, Monterey Superior Court, Sonoma Superior Court, San Francisco County
9 Superior Court, the San Diego County Superior Court, and the United States District Courts for
10 the Central, Eastern, Southern, and Northern Districts of California.

11 8. I have been approved as Class Counsel in a number of class actions, including but
12 not limited to *Chan-Lanier v. Citibank* (Case No. CGC-050445143); *Hernandez v. CVS*
13 *Pharmacy, Inc.* (Judicial Council Coordination Proceeding No. 4539), *Tse v. Best Buy Co, Inc.*
14 (Case Number BC 393717), *Orgeta v. AIG, Inc* (Case Number CV 06—196-RSWL (PJWx)),
15 and *Castro v. UPS Freight, Inc.* (Case Number CV 08-4898 ODW (CWx)) and by this Court in
16 *Chavez v. PVH* (Case No. C 13-01797 LHK).

17 9. In addition, I was certified as class counsel by the United States District Court,
18 Central District of California in the case of *Abdullah v. U.S. Security* (Case Number CV 09-
19 09554 GHK), *Avilez v. Pinkerton Government Services, Inc.* (Case Number SACV 11-0493-
20 DOC), *Dynabursky v. Allied Barton Security Services* (Case Number SACV 12-02210 JST); and
21 *Pace v. Petsmart, Inc.* (Case Number SACV 13-500-DOC); by the Northern District of
22 California in the cases of *Harris v. Vector Marketing Corp.*, (Case Number CV 08 5198 EMC),
23 and *Lemus et al. v. H&R Block Enterprises, LLC* (Case Number CV-09-03179-SI); and by the
24 Superior Court of California, Orange County in the cases of *De la Cruz v. Abercrombie & Fitch*
25 *Co. et al.* (Case Number 30-2007-00036240) and *Wu v. General Nutrition Corporation* (Case
26 Number 30-2012-00593759), all as part of the Courts' orders granting class certification
27 pursuant to Rule 23 of the FRCP and California Code of Civil Procedure § 382.

28 I declare under penalty of perjury under the laws of the State of California that the

1 foregoing is true and correct.

2 Executed on this 14th day of September, 2020, at Los Angeles, California.

3
4 
5 _____
6 Larry W. Lee
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28