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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

CASSANDRA WALKER, FRANCES PARDO,
CHRISTIAN VERDUZCO, COLLIN JOHNSON,
and HANNAH GANSEN, as private attorneys
general,

Plaintiffs,

vs.

FITNESS ALLIANCE, LLC, a California limited
liability company; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 37-2023-00020191-CU-OE-CTL

[Hon. Joel R. Wohlfeil, Department C-73]

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

Date: November 7, 2024
Time: 9:00 a.m.
Department: C-73

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, Cassandra Walker. I make this
4 declaration on the basis of my own personal knowledge, except as to those matters stated on information
5 and belief and, as to those matters, I believe them to be true. If called as a witness, I could testify
6 competently as to the facts stated in this declaration.

7 2. I have spent significant time researching and pursuing the claims that have been alleged
8 in this action. I engaged in numerous discussions with Defendant's counsel and in informal discovery
9 that included the exchange of employee data and Defendant's pertinent policies and practices. Although
10 I am confident that litigation of the claims would result in a judgment against Defendant, I recognize the
11 inherent risks in litigation, including the specific risks that liability could not be established at trial or
12 that the applicable law could change, as well as the potential for appeals and the costs of pursuing
13 litigation. Based on my review of all the information, and based on my experience in class and
14 representative action litigation, I believe this settlement to be fair, adequate, and reasonable.

15 3. I was retained based upon a contingency fee arrangement wherein Plaintiff's counsel
16 agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had
17 Plaintiff failed to prevail in this case, counsel for Plaintiff would have spent a significant amount of
18 time, money, and other resources without any benefit or return. In addition, had Plaintiff failed to prevail
19 in the present case, Defendant also would have been able to seek costs in connection with its defense of
20 the case.

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

1 5. My firm's primary focus is employment law. I have handled a number of wage and hour
2 matters including class actions and individual actions, on both plaintiff and defense sides. I have a
3 practice that encompasses cases throughout the State of California, including but not limited to the Los
4 Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior
5 Courts, the San Diego County Superior Courts, and the United States District Courts for the Central,
6 Eastern, Northern, and Southern Districts of California. I have been named as Class Counsel in a
7 number of class actions that have been granted final approval by the Superior Courts of Los Angeles
8 County, Orange County, San Francisco County, Alameda County, Contra Costa County, Monterey
9 County, San Bernardino County, Santa Clara County, Sonoma County, and the United States District
10 Court for the Central, Eastern, and Northern Districts of California.

11 I declare under penalty of perjury under the laws of the State of California that the foregoing is
12 true and correct. Executed this 15th day of October 2024, at Los Angeles, California.

13 

14 _____
Larry W. Lee