

JAMIE SERB (SBN 289601)
jamie@crosnerlegal.com
BRANDON BROUILLETTE, ESQ. (SBN 273156)
bbrouillette@crosnerlegal.com
ZACHARY M. CROSNER, ESQ. (SBN 272295)
zach@crosnerlegal.com
CROSNER LEGAL, PC
9440 Santa Monica Blvd. Suite 301
Beverly Hills, CA 90210
Tel: (866) 276-7637
Fax: (310) 510-6429

Attorneys for Plaintiff CHARMAINE TATE
As an individual and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF EL DORADO

CHARMAINE TATE, as individuals and on
behalf of all others similarly situated,

Plaintiffs,

vs.

PRO ENERGY SERVICES GROUP, LLC, a
Delaware Limited Liability Company; and DOES
1-100, inclusive,

Defendants.

Case No. 23CV0586

[Hon. Gary S. Stossberg, Department 9]

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND REQUEST FOR
ATTORNEY'S FEES AND COSTS**

Date: February 21, 2025

Time: 8:30 a.m.

Department: 9

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

7 2. Class Counsel engaged in extensive factual investigation before settling, including the
8 exchange of extensive informal discovery and class data. This allowed Plaintiffs to conduct a full
9 damage analysis. The Agreement was the product of negotiation between highly able and experienced
10 attorneys on both sides who possessed the relevant data and extensive legal research which they had
11 carefully analyzed.

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

16 4. My firm has a great deal of experience in wage and hour class action litigation and has
17 been approved as class counsel in a number of class actions.

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

26 6. My firm's primary focus is employment law. I have handled a number of wage and hour
27 matters including class actions and individual actions, on both plaintiff and defense sides. I have a
28 practice that encompasses cases throughout the State of California, including but not limited to the Los

1 Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior
2 Courts, the San Diego County Superior Courts, and the United States District Courts for the Central,
3 Eastern, Northern, and Southern Districts of California. I have been named as Class Counsel in a
4 number of class actions that have been granted final approval by the Superior Courts of Los Angeles
5 County, Orange County, San Francisco County, Alameda County, Contra Costa County, Monterey
6 County, San Bernardino County, Santa Clara County, Sonoma County, and the United States District
7 Court for the Central, Eastern, and Northern Districts of California.

8 7. My firm has incurred costs in the amount of \$2,112.77. The costs are all litigation related
9 costs, including filing fees. Attached hereto as **Exhibit A** is copy of the costs my firm has incurred in
10 connection with prosecution of Dave Crockett's lawsuit.

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 23rd day of January 2025, at Los Angeles, California.

13 

14 _____
Larry W. Lee