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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

SINDE TORRES and CRISTINA
GUERRERO, as individuals and on behalf
of all others similarly situated,

Plaintiffs,

vs.

FIDELITY NATIONAL MANAGEMENT
SERVICES, LLC, a Delaware limited
liability company; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 23CV416377

[Assigned to the Hon. Charles F. Adams,
Department 7]

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFFS’ MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: September 4, 2025
Time: 1:30 P.M.
Dept.: 7

Action Filed: May 23, 2023
Trial Date: Not 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 Sinde Torres and Cristina Guerrero (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 proposed settlement meets the criteria for this Court to grant final approval of this matter on a class-wide basis, as the settlement is fair, adequate, and reasonable.

3. The Joint Stipulation of Class Action and PAGA Settlement (“Settlement Agreement”) was the product of arm’s length negotiations between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. Plaintiffs’ counsel engaged in extensive factual investigation before settling. The Parties also participated in mediation with the Honorable Brian C. Walsh (Ret.). The Parties conducted informal discovery prior to mediation, including reviewing class data and the production of Defendant’s relevant policies and practices. The exchange of information allowed Plaintiffs’ counsel to analyze liability and exposure.

4. I have spent significant time researching and pursuing the claims that have been alleged in this action. Based on my independent investigations and evaluations, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Settlement Class in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arm's length and was facilitated by an experienced and neutral mediator. Thus, this settlement should be granted final approval.

5. Any remaining monies from uncashed settlement checks will be transmitted to the proposed *cy pres* recipient, Legal Aid at Work. I do not have any conflicts of interest with the proposed *cy pres* recipient.

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 in the Los Angeles Superior Courts, the Orange County Superior Courts, the
9 San Francisco County Superior Courts, the San Diego County Superior Courts, and the United
10 States District Courts for the Central, Eastern, Northern, and Southern Districts of California.

11 8. I have been named as class counsel in a number of class actions that have been
12 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
13 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
14 County, Santa Clara County, Sonoma County, and the United States District Court for the
15 Central, Eastern, and Northern Districts of California, including but not limited to the following
16 class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-
17 05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No.
18 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx);
19 *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial Council
20 Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No.
21 BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539;
22 *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v.*
23 *Community Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No.
24 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court Judicial Council
25 Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior
26 Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court
27 Case No. CV-18-558.

28 9. I have been approved as class counsel in numerous other wage/hour class actions

1 that have been granted class certification and final approval.

2 10. To date, I have incurred approximately 119.9 hours in connection with the
3 litigation of this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of
4 work I have incurred to date on this matter. I also anticipating spending an additional 10 hours on
5 post-approval settlement administration, including corresponding with class members, the
6 settlement administrator, and fielding calls regarding the settlement. Thus, the total amount of
7 my fees incurred in this case is approximately \$116,910.00, based on an hourly rate of \$900.00
8 per hour ((119.9 + anticipated 10 hours) x \$900.00).

9 11. Since at least 2020, I have been approved at an hourly rate of \$750.00 per hour by
10 various courts. Examples of these courts include the following cases: *Hernandez v. Wells Fargo*
11 *Bank*, Santa Clara County Superior Court Case No. 16CV299319; *Carrillo v. New Balance*
12 *Athletics, Inc.*, Santa Clara County Superior Court Case No. 19CV352469; *Ramirez v. Walgreen*
13 *Co.*, United States District Court, Northern District of California Case No. 18-cv-03921-EJD;
14 *Chavez v. Converse, Inc.*, United States District Court, Northern District of California Case No.
15 15-cv-03746-NC; *Foster v. Schindler Elevator Corporation*, Alameda County Superior Court
16 Case No. RG19029640; *Foad Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case
17 No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No.
18 BC720144; *Mary Della Maggiora v. Watsonville Community Hospital*, Santa Cruz County
19 Superior Court Case No. 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino
20 County Superior Court Case No. CIVDS1823132; *Michael Randolph v. Pacific Racing*
21 *Association*, Alameda County Superior Court Case No. RG18908139; *Markham v. Quik Stop*
22 *Markets, Inc.*, Santa Clara County Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*,
23 Ventura County Superior Court Case No. 56-2019-005279959-CU-OE-VTA; *Carter v. Kline*
24 *Services, Inc.*, San Bernardino County Superior Court Case No. CIVDS1828867; and *Prexxie*
25 *Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara County Superior Court
26 Case No. 19CV345211.

27 12. I was approved at an hourly rate of \$800.00 per hour in *Martinez and Acosta v.*
28 *City of Hope National Medical Center, et al.*, San Bernardino County Superior Court Case No.

1 CIVDS2015729; *Jaime Moen v. Genentech, Inc.*, San Diego County Superior Court Case No.
2 37-2021-00008619-CU-OE-CTL; *Murray v. Granite Wellness Centers et al.*, Nevada County
3 Superior Court Case No. CU20-084680; *Smith, et al. v. Clean Harbors Environmental Services,*
4 *Inc.*, Sacramento County Superior Court Case No. 34-2021-00292526; *Correa et al. v. FedEx*
5 *Supply Chain, Inc.*, San Bernardino County Superior Court Case No. CIVDS2023369; *Meguro v.*
6 *Silicon Valley Bank*, Santa Clara County Superior Court Case No. 20CV369854; and *Linaki v.*
7 *Genji Pacific, LLC*, Alameda County Superior Court Case No. RG20074795.

8 13. Starting in 2025, I have increased my billing rate to \$900.00. Throughout 2024, I
9 was approved at \$850.00 per hour in *Stephenson v. Healthcare Services, Inc.*, Orange County
10 Superior Court Case No. 30-2019-01078609-CU-OE-CXC, *Lakey v. Poshmark, Inc.*, Santa Clara
11 Superior Court, Case No. 22CV395084; *Audycki v. Stanford Health Care*, Santa Clara Case No.
12 19CV347173; *Palomino v. Northrop Grumman Systems Corporation*, Santa Clara Superior
13 Court Case No. 19CV345534; *Lakey v. Poshmark, Inc.*, Santa Clara Superior Court, Case No.
14 22CV395084; *Stephenson v. Healthcare Services, Inc.*, Orange County Superior Court Case No.
15 30-2019-01078609-CU-OE-CXC; and *Medina v. United Airlines, Inc.*, Los Angeles Superior
16 Court, Case No. BC624742. I was previously approved at the rate of \$900.00 per hour in
17 *Abernathy v. Deacon Construction, LLC*, Santa Clara Case No. 20CV367327.

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

20 Executed on this 12th day of August 2025, at Los Angeles, California.

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23 _____
24 Larry W. Lee
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EXHIBIT A

Torres and Guerrero v. Fidelity National Management Services, LLC
Larry W. Lee Time and Task Chart

Hours	Description of Work
10.5	Review client documents and research Defendant's background and prior litigation history.
1.2	Further draft and revise class complaint; confer with co-counsel re same.
2.6	Draft PAGA letters; review and revise PAGA complaint.
12.5	Conduct legal research re viability of regular rate theory of liability where employees receive sign-on bonuses, which accrue over time; confer with co-counsel re same; confer with clients re experiences regarding how bonuses earned, when paid, etc.; perform calculations to evaluate liability on this claim.
3.2	Initial conversations and correspondence with inhouse counsel for Defendant prior to outside defense counsel being retained; discussions re progression of case; confer with co-counsel re same.
.7	Review and revise supplemental PAGA letters
2.0	Further review and revise case management statements and notices of scheduling from Court re case management conferences.
1.5	Conduct research into mediators proposed for mediation; confer with co-counsel re same.
9.4	Review and revise mediation data requests considering research; confer with co-counsel re same; analyze and review Defendant's production of sign-on bonus contracts, time and pay data, and employee handbooks to further refine requests and strategize for mediation.
2.0	Analyze and review notice of reassignment of case to new judge; conduct research re whether to submit 170.6 declaration; analyze and review prior orders and cases for purposes of same.
19.7	Confer with putative class members re employer's practices of paying sign-on bonuses; confer with co-counsel re same and refine theory of liability and follow up questions for further investigation.
8.4	Confer with counsel and expert consultant re damages analysis for purposes of mediation; review expert damage analysis; strategize re same.
3.8	Conduct research re similar case settlements addressing same regular rate of pay and wage statement issues; analyze and review pleadings in those cases to determine settlement range; conduct research re prior settlements of defendant's to prepare for mediation and inform briefing.
2.3	Further draft and revise mediation brief; confer with co-counsel re same.
2.8	Review and revise MOU; confer with co-counsel re same.
6.3	Review and revise long form settlement agreement and class notice; confer with counsel re same

2.5	Further revise class notice; confer with co-counsel re same.
1.7	Further revise stip and proposed order and amended complaint regarding withdrawal of class claims for first cause of action and consolidation of PAGA claim into first-filed case number; confer with co-counsel re same.
5.1	Analyze and review docket and pleadings in related action to determine whether overlap with proposed settlement; confer with co-counsel re same; conduct legal research to further evaluate potential impact of related action, if any.
3.5	Review and revise Motion for Preliminary Approval and supporting documents
15.1	Confer with class members re settlement issues; confer with settlement administrator re same.
3.1	Review and revise Motion for Final Approval and supporting documents
119.9	TOTAL HOURS