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Erika Perez Paredes on behalf of herself
and all similarly aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MONTEREY**

ERIKA PEREZ PAREDES, on behalf of
herself and all similarly aggrieved
employees,

Plaintiff,

v.

CONSTANT STAFFING, LLC; DEL
MONTE FRESH PRODUCE N.A., INC.;
MANN PACKING CO., INC.; and DOES
1 through 50, inclusive,

Defendants.

Case No. 23CV002616

(Assigned to the Honorable Ian A. Rivamonte,
Dept. 14)

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

Date: February 20, 2026
Time: 8:30 A.M.
Dept.: 14

Action Filed: July 20, 2023
Trial Date: None Set

DECLARATION OF LARRY W. LEE

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 Erika Perez Paredes (“Plaintiff”). 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 and PAGA Settlement (“Stipulation” or “Agreement”) was the product of negotiations between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. The Parties engaged in arm’s length negotiations at mediation over three mediation sessions, resulting in the settlement.

4. Class Counsel engaged in extensive factual investigation before settling, including the exchange of formal and informal discovery and a sampling of class time and pay records, in addition to review of various policies as previously detailed. Class Counsel also engaged an expert in the analysis of time and pay records and exposure.

5. 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 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.

6. Any remaining monies from uncashed settlement checks will be distributed to the *cy pres* recipient California Rural Legal Assistance, Inc., in accordance with Code of Civil Procedure § 384. I do not have any relationship with or connection to said organization.

7. I have been approved as class counsel in numerous other wage/hour class actions that have been granted class certification and final approval.

1 8. To date, I have incurred approximately 93.3 hours in connection with the
2 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred
3 to date.

4 9. I also anticipate spending an additional 5 hours conferring and reviewing e-mails
5 and other written communications with counsel for Defendants, the Settlement Administrator,
6 and Class Members regarding post final approval matters, including payments and related issues.

7 10. The total lodestar for my hours will be approximately \$88,470.00, based on the
8 above total hours of 98.3 (93.3 hours + 5 anticipated hours) at an hourly rate of \$900.00 per hour.

9 11. My current billing rate is \$900.00 per hour. I have been approved at an hourly
10 rate of \$850.00 per hour by various courts, including *Stephenson v. Healthcare Services, Inc.*,
11 Orange County Superior Court Case No. 30-2019-01078609-CU-OE-CXC, *Lakey v. Poshmark,*
12 *Inc.*, Santa Clara Superior Court, Case No. 22CV395084; *Audycki v. Stanford Health Care,*
13 Santa Clara Superior Court Case No. 19CV347173; *Palomino v. Northrop Grumman Systems*
14 *Corporation*, Santa Clara Superior Court Case No. 19CV345534; *Lakey v. Poshmark, Inc.*, Santa
15 Clara Superior Court, Case No. 22CV395084; *Stephenson v. Healthcare Services, Inc.*, Orange
16 County Superior Court Case No. 30-2019-01078609-CU-OE-CXC; and *Medina v. United*
17 *Airlines, Inc.*, Los Angeles Superior Court, Case No. BC624742.

18 12. As of January 1, 2024, my hourly rate for class and representative actions
19 increased to \$900.00 per hour. I was approved at an hourly rate of \$900.00 in *Abernathy v.*
20 *Deacon Construction, LLC*, Santa Clara Superior Court Case No. 20CV367327, and *Jordan v.*
21 *Mondelez Global LLC*, San Bernardino Superior Court Case No. CIVSB2202758.

22 13. **Reduced hourly rate:** Although I believe \$900.00 per hour is a reasonable rate
23 for my services, as it has been approved throughout California, in this motion, I request a
24 reduced hourly rate of \$595.00, which considers the jurisdiction where this Action was litigated.
25 Based on the reduced hourly rate of \$595.00, my lodestar for this matter will be **\$58,488.50**,
26 based on 98.3 hours.

27 14. I am one of the primary attorneys on this matter. My qualifications are as follows:
28 I received my J.D. from Arizona State University College of Law in 2003. During law school, I

1 was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated *cum laude*
2 from Arizona State University College of Law in the top 10% of my class. While I was in law
3 school, I was the Associate Managing Editor of the Arizona State University College of Law,
4 Law Journal. Upon graduation, I practiced law as an associate at the Los Angeles County offices
5 of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm that
6 represents a significant number of Fortune 500 companies.

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

12 16. I have been named as Class Counsel in a number of class actions that have been
13 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
14 Francisco County, and the United States District Court for the Central District of California,
15 including the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
16 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
17 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
18 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
19 Judicial Council Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior
20 Court Case No. BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination
21 Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-
22 00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County Superior
23 Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court
24 Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda
25 County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County
26 Superior Court Case No. CV-18-558.

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

Executed on this 27th day of January 2026, at Los Angeles, California.



Larry W. Lee

EXHIBIT A

Paredes v. Constant Staffing et al.
Monterey County Superior Court
Case No. 23CV002616
Time and Task Chart – Larry W. Lee

Hours	Description of Work
3.8	Initial meeting with co-counsel; review client documents; review PAGA letter
2.6	Review and revise complaint, FAC, SAC, and TAC; research causes of action in preparation for same
3.4	Review notice of related cases; research related cases and impact on this case
1.9	Review and revise first set of discovery requests to defendants
4.6	Review defendants' responses to discovery requests and documents produced by defendants; meet and confer re same
1.6	Review defendants' supplemental responses to first set of discovery requests
1.5	Review and revise second set of discovery requests to defendants
4.5	Review defendants' responses to second set of discovery requests and documents produced by defendants; meet and confer re same
2.6	Confer with counsel re potential mediation and necessary class data for same
3.8	Review mediation data
3.5	Review/revise mediation brief
8.4	Attend first mediation with David Rotman
1.2	Meet and confer re case status following first mediation
2.4	Follow up discussions with David Rotman re potential settlement
.8	Meet and confer with counsel regarding utilizing different mediator for second mediation
4.8	Review additional data produced for second mediation; review and revise mediation brief for same
8.6	Attend second mediation
2.2	Follow up discussions with counsel and Judge Kirwan re potential settlement issues and potential third mediation date
11.7	Travel to and attend third mediation in person; travel back from same
5.6	Review and revise MOU; confer with counsel re same
6.1	Review and revise Long Form Settlement Agreement; confer with counsel re same
3.7	Review and revise motion for preliminary approval

Hours	Description of Work
1.6	Confer with class members re settlement issues
2.4	Review and revise Motion for Final Approval and supporting documents
93.3	TOTAL HOURS