

**BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP**

Norman B. Blumenthal (SBN 068687)  
Kyle R. Nordrehaug (SBN 205975)  
Aparajit Bhowmik (SBN 248066)  
Victoria B. Rivapalacio (SBN 275115)  
Christine T. LeVu (SBN 288271)  
Adolfo Sanchez Contreras (SBN 354371)  
2255 Calle Clara  
La Jolla, CA 92037  
Telephone: (858) 551-1223  
Facsimile: (858) 551-1232

Attorneys for *Plaintiffs*

[Additional counsel on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

LAURA WEITZ and LAILA FAIZ, individuals,  
on behalf of themselves and on behalf of all  
persons similarly situated, and on behalf of the  
State of California, as a private attorney general,

Plaintiff,

v.

BANANA REPUBLIC, LLC, a Limited Liability  
Company; THE GAP, INC., a Corporation; and  
DOES 1 through 50, inclusive,

Defendants.

Case No. 23STCV19287

**CLASS ACTION**

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

Date: November 9, 2026  
Time: 10:00 a.m.  
Dept.: 11

Complaint Filed: April 17, 2023  
FAC Filed: January 16, 2024

1 Larry W. Lee (State Bar No. 228175)  
2 Max W. Gavron (State Bar No. 291697)  
3 Kwanporn “Mai” Tulyathan (State Bar No. 316704)  
4 DIVERSITY LAW GROUP, P.C.  
5 515 S. Figueroa Street, Suite 1250  
6 Los Angeles, CA 90071  
7 (213) 488-6555  
8 (213) 488-6554 facsimile  
9 lwlee@diversitylaw.com  
10 mgavron@diversitylaw.com  
11 ktulyathan@diversitylaw.com

8 William L. Marder (State Bar No. 170131)  
9 bill@polarislawgroup.com  
10 Polaris Law Group  
11 501 San Benito Street, Suite 200  
12 Hollister, CA 95023  
13 (831) 531-4214  
14 (831) 634-0333 facsimile

15 *Attorneys for Plaintiffs*

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

**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 Laila Faiz (“Plaintiff” or “Faiz”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. The settlement 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. This allowed Class Counsel to perform a detailed analysis of the potential damages.

3. 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 Members, 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.

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

5. My firm’s primary focus is employment law. I have handled a number of wage and hour matters including class actions and multiple-plaintiff actions. I have a practice that encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County

1 Superior Courts, the San Diego County Superior Courts, and the United States District Courts for the  
2 Central, Eastern, Northern, and Southern Districts of California.

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

17 7. To date, I have incurred approximately 54.7 hours in connection with the litigation of this  
18 lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of work I have incurred to  
19 date on this matter.

20 8. I also anticipate spending an additional 5 hours handling post-approval matters, including  
21 conferring and reviewing e-mails and other written communications with counsel for Defendant, the  
22 Settlement Administrator, and Settlement Class Members regarding post final approval matters,  
23 including payments and any potential related issues.

24 9. The total lodestar for my hours will be approximately **\$53,730.00**, based on the above  
25 total hours of 59.7 (54.7 hours + 5.0 anticipated hours) at an hourly rate of \$900.00 per hour.

26 10. Throughout 2024, I was approved at \$850.00 per hour in *Stephenson v. Healthcare*  
27 *Services, Inc.*, Orange County Superior Court Case No. 30-2019-01078609-CU-OE-CXC, *Lakey v.*  
28 *Poshmark, Inc.*, Santa Clara Superior Court, Case No. 22CV395084; *Audycki v. Stanford Health Care*,

1 Santa Clara Superior Court Case No. 19CV347173; *Palomino v. Northrop Grumman Systems*  
2 *Corporation*, Santa Clara Superior Court Case No. 19CV345534; *Lahey v. Poshmark, Inc.*, Santa Clara  
3 Superior Court, Case No. 22CV395084; *Stephenson v. Healthcare Services, Inc.*, Orange County  
4 Superior Court Case No. 30-2019-01078609-CU-OE-CXC; and *Medina v. United Airlines, Inc.*, Los  
5 Angeles Superior Court, Case No. BC624742.

6 11. I was approved at an hourly rate of \$800.00 per hour in *Martinez and Acosta v. City of*  
7 *Hope National Medical Center, et al.*, San Bernardino County Superior Court Case No.  
8 CIVDS2015729; *Jaime Moen v. Genentech, Inc.*, San Diego County Superior Court Case No. 37-2021-  
9 00008619-CU-OE-CTL; *Murray v. Granite Wellness Centers et al.*, Nevada County Superior Court  
10 Case No. CU20-084680; *Smith, et al. v. Clean Harbors Environmental Services, Inc.*, Sacramento  
11 County Superior Court Case No. 34-2021-00292526; *Correa et al. v. FedEx Supply Chain, Inc.*, San  
12 Bernardino County Superior Court Case No. CIVDS2023369; *Meguro v. Silicon Valley Bank*, Santa  
13 Clara County Superior Court Case No. 20CV369854; *Linaki v. Genji Pacific, LLC*, Alameda County  
14 Superior Court Case No. RG20074795; and *Robert Jordan v. Mondelez Global, LLC*, San Bernardino  
15 County Superior Court Case No. CIVSB2202758.

16 12. As of January 1, 2024, my hourly rate in class and representative actions is \$900.00 per  
17 hour. I was approved at an hourly rate of \$900.00 in *Abernathy v. Deacon Construction, LLC*, Santa  
18 Clara Superior Court Case No. 20CV367327; *Jordan v. Mondelez Global LLC*, San Bernardino Superior  
19 Court Case No. CIVSB2202758; and *Middlebrooks v Fleetpride, Inc.*, Shasta County Superior Court  
20 Case No. 23CV-0202247.

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

23 Executed on September 18, 2026, at Los Angeles, California.

24 

25 \_\_\_\_\_  
26 Larry W. Lee  
27  
28

# EXHIBIT A

***Weitz/Faiz v. Banana Republic, LLC et al***  
**Larry W. Lee Time and Task Chart**

| Hours       | Description of Work                                                                                                                                                                                                                    |
|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6.2         | Initial research and review of background facts in preparation for filing of class action claims; review PAGA letter; confer with co-counsel re theories of liability and conduct research re same; analysis and research re defendant |
| 2.1         | Review and revise complaint                                                                                                                                                                                                            |
| 1.2         | Review and revise first set of written discovery                                                                                                                                                                                       |
| 3.8         | Research related cases; meet and confer with co-counsel re same                                                                                                                                                                        |
| 1.6         | Review and revise joint case management conference statements.                                                                                                                                                                         |
| 3.5         | Review and revise opposition to demurrer and motion for sanctions; meet and confer re same                                                                                                                                             |
| 4.8         | Review exposure analysis for mediation purposes                                                                                                                                                                                        |
| 9.0         | Attend mediation                                                                                                                                                                                                                       |
| 1.7         | Discussions with the mediator                                                                                                                                                                                                          |
| 3.1         | Review and revise MOU                                                                                                                                                                                                                  |
| 6.2         | Review and revise settlement agreements and related documents (i.e., settlement agreement, class notice); confer with co-counsel re terms of settlement agreement and make revisions in light of same                                  |
| 5.1         | Review and revise Motion for Preliminary Approval                                                                                                                                                                                      |
| 2.0         | Review and revise amended settlement agreement                                                                                                                                                                                         |
| 4.4         | Review and revise Motion for Final Approval                                                                                                                                                                                            |
|             |                                                                                                                                                                                                                                        |
| <b>54.7</b> | <b>TOTAL HOURS</b>                                                                                                                                                                                                                     |