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Attorneys for Plaintiff and the Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

ELISA RECODER, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

ADECCO USA, INC., a Delaware
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: CGC-23-610955

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFF’S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: August 18, 2025

Time: 9:00 a.m.

Dept.: 301

Action Filed: December 8, 2023

Trial Date: September 8, 2025

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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, P.C., counsel of record for Plaintiff Elisa Recoder (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Plaintiff's Counsel has zealously represented the interests of Plaintiff and the aggrieved employees.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the fairness of the settlement. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, I have concluded that settlement on the terms set forth in the PAGA Settlement Agreement (“Settlement Agreement”) is appropriate and in the best interests of Plaintiff and the aggrieved employees.

4. My qualifications are as follows: I received my JD 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.

5. For more than one and a half years 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 50 companies, including many actions involving wage and hour matters.

6. My primary practice is employment law. I have handled a number of wage and hour matters including class actions and individual actions, on both plaintiff and defense sides. I have a practice that encompasses cases throughout the State of California, including but not limited to the Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior Courts, the San Diego County Superior Courts, and the United States

District Courts for the Central, Eastern, Northern, and Southern Districts of California. I have been named as Class Counsel in a number of class actions that have been granted final approval by the Superior Courts of Los Angeles County, Orange County, San Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino County, Santa Clara County, Sonoma County, and the United States District Court for the Central, Eastern, and Northern Districts of California, including but not limited to the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court Case No. JCCP 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC392717; and *Hernandez v. CVS Corporation*, Los Angeles Superior Court Case No. JCCP 4539.

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

8. To date, I have incurred approximately 12.8 hours in connection with the litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred to date.

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

10. I have been approved at an hourly rate of \$800.00 per hour by various courts, including *Martinez and Acosta v. City of Hope National Medical Center, et al.*, San Bernardino County Superior Court Case No. CIVDS2015729; *Jaime Moen v. Genentech, Inc.*, San Diego County Superior Court Case No. 37-2021-00008619-CU-OE-CTL; *Murray v. Granite Wellness Centers et al.*, Nevada County Superior Court Case No. CU20-084680; *Smith, et al. v. Clean Harbors Environmental Services, Inc.*, Sacramento County Superior Court Case No. 34-2021-00292526; *Correa et al. v. FedEx Supply Chain, Inc.*, San Bernardino County Superior Court Case No. CIVDS2023369; *Meguro v. Silicon Valley Bank*, Santa Clara County Superior Court

Case No. 20CV369854; *Linaki v. Genji Pacific, LLC*, Alameda County Superior Court Case No. RG20074795; and *Robert Jordan v. Mondelez Global, LLC*, San Bernardino County Superior Court Case No. CIVSB2202758.

11. I have also been approved at \$850.00 per hour by various courts, including: *Stephenson v. Healthcare Services, Inc.*, Orange County Superior Court Case No. 30-2019-01078609-CU-OE-CXC, *Lakey v. Poshmark, Inc.*, Santa Clara Superior Court, Case No. 22CV395084; *Audycki v. Stanford Health Care*, Santa Clara Case No. 19CV347173; *Palomino v. Northrop Grumman Systems Corporation*, Santa Clara Superior Court Case No. 19CV345534; *Lakey v. Poshmark, Inc.*, Santa Clara Superior Court, Case No. 22CV395084; *Stephenson v. Healthcare Services, Inc.*, Orange County Superior Court Case No. 30-2019-01078609-CU-OE-CXC; and *Medina v. United Airlines, Inc.*, Los Angeles Superior Court, Case No. BC624742.

12. As of January 1, 2024, my hourly rate for class and representative actions increased to \$900.00 per hour. I was approved at an hourly rate of \$900.00 in *Jordan v. Mondelez Global LLC*, San Bernardino County Case No. CIVSB2202758.

13. Thus, I anticipate the total amount of my fees incurred in this case to be approximately \$16,020.00 ([12.8 hours + 5 anticipated] x \$900.00) based on an hourly rate of \$900.00 per hour.

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

Executed on this 23rd day of July 2025, at Los Angeles, California.



Larry W. Lee

EXHIBIT A

Recoder v. Adecco USA
Larry W. Lee Time and Task Chart

Hours	Description of Work
1.8	Review client documents and research Defendant's background and prior litigation history; confer with co-counsel re same
.9	Review and revise PAGA letter; review and revise complaints
1.3	Review and revise first set of written discovery; analyze client documents for same purpose.
2.5	Confer with counsel re mediation and mediation data; review documents produced by Defendant in advance of mediation.
2.9	Review and revise mediation brief; further analyze data and calculate damages for same.
.5	Post mediation discussions with co-counsel re settlement terms
1.4	Review and revise settlement agreement; confer with counsel re same
1.5	Review and revise Motion for Approval and supporting documents
12.8	TOTAL HOURS