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Attorneys for Plaintiff Mark Hardiman

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF BUTTE

MARK HARDIMAN, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

JOY SIGNAL TECHNOLOGY LLC, an Ohio
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No. 23CV03426

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

Date: February 25, 2026
Time: 9:00 a.m.
Dept.: 1

Action Filed: December 8, 2023
Trial Date: None Set

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

3. I strongly believe that Plaintiff can prevail at trial. However, after taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, including the still-developing law under PAGA, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, as well as the possibility of appeals, I have concluded that settlement on the terms set forth in the Settlement Agreement is appropriate and in the best interests of Plaintiff and the Aggrieved Employees.

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

6. 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, Judicial Council Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court Case No. CV-18-558.

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

Executed on this 26th day of January 2026, at Los Angeles, California.


Larry W. Lee