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15 Attorneys for Plaintiff, the Class and Aggrieved Employees

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18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **FOR THE COUNTY OF SAN JOAQUIN**

20 ANDREA ZUNIGA, as an individual and
21 on behalf of all others similarly situated,

22 Plaintiff,

23 vs.

24 COAST PROFESSIONAL, INC.; and
25 DOES 1 through 50, inclusive,

26 Defendants.

Case No.: STK-CV-UOE-2023-9784

[Assigned for all purposes to the Hon. George J.
Abdallah, in Department 10A]

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

Date: March 26, 27, 28, 2025 or April 2, 3, 2025
Time: 9:00 a.m.
Dept.: 10A

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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 Andrea Zuniga. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I have spent significant time researching and pursuing the claims that have been alleged in this action. Based on my own independent investigation and evaluation, I am of the opinion that settlement for the consideration and terms set forth the Class Action and PAGA Settlement Agreement (“Agreement” or “Settlement Agreement”) 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.

3. 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.

4. My firm's primary focus 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.

5. 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

1 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
2 County, Santa Clara County, Sonoma County, and the United States District Court for the
3 Central, Eastern, and Northern Districts of California, including but not limited to the following
4 class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-
5 05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No.
6 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx);
7 *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial Council
8 Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No.
9 BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539;
10 *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v.*
11 *Community Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No.
12 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court Judicial Council
13 Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior
14 Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court
15 Case No. CV-18-558.

16 6. My co-counsel and I will adequately represent the Class Members in this action.
17 Plaintiff's counsel have and will zealously represent Plaintiff and the Class and pursue this
18 lawsuit to its conclusion.

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct. Executed on February 28, 2025, at Los Angeles, California.

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23 _____
24 Larry W. Lee
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