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Attorneys for Plaintiff, the Class and Aggrieved Employees

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

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

Plaintiff,

vs.

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

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
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: September 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 am one of the primary attorneys on this matter. The Class Action and PAGA Settlement Agreement (“Agreement” or “Settlement Agreement”) was the product of negotiations between highly able and experienced attorneys on both sides who possessed the relevant data and conducted extensive legal research. Additionally, my co-counsel and I conducted significant investigation in this case, including informal discovery and exchanges of information regarding data for the putative class, as well as documents and information pertaining to Defendant Coast Professional, Inc.’s (“Defendant”) regular rate calculation policies and practices.

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, 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. My office was retained based upon a contingency fee arrangement wherein Class Counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiff failed to prevail in the matter, Class Counsel would have spent a significant amount of time, money and other resources without any benefit or return.

5. 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

1 practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash
2 Smoak & Stewart, P.C., a national employment defense law firm that represents a significant
3 number of Fortune 500 companies.

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

9 7. I have been named as class counsel in a number of class actions that have been
10 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
11 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
12 County, Santa Clara County, Sonoma County, and the United States District Court for the
13 Central, Eastern, and Northern Districts of California, including but not limited to the following
14 class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-
15 05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No.
16 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx);
17 *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial Council
18 Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No.
19 BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539;
20 *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v.*
21 *Community Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No.
22 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court Judicial Council
23 Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior
24 Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court
25 Case No. CV-18-558.

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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on August 11, 2025, at Los Angeles, California.

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