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Attorneys for Plaintiffs and the Class

[Additional Counsel Information on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF STANISLAUS

CHELSEY RICHARDSON, BETHANY
JEANNE REINKER, and CHARMAINE
HUFF as individuals and on behalf of all
others similarly situated and aggrieved
employees,

Plaintiffs,

vs.

TELECARE CORPORATION, a
California corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CV-24-006292

[Assigned for All Purposes to:
Hon. John R. Mayne, Dept. 21]

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND PAGA
SETTLEMENT**

(Filed concurrently with Supporting Declarations
and [Proposed] Order)

Date: May 29, 2026
Time: 8:30 a.m.
Dept.: 21

Action Filed: August 9, 2024
Trial Date: None Set

1 **JUSTICE FOR WORKERS, P.C.**

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8 **BLAKE JONES LAW, PC**

355 South Grand Avenue

9 Suite 2450 - #2052

Los Angeles, CA 90071

10 Tel: (323) 576-3221

11 Attorneys for Plaintiffs and the Class

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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 Chelsey Richardson (“Plaintiff”). 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 negotiation between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. Plaintiff's counsel engaged in extensive factual investigation and discovery before settling, including the exchange of formal and informal discovery and necessary class data. This includes the number of putative class members employed by Defendant, the number of workweeks and pay periods at issue, and applicable rates of pay, as well as information pertaining to Defendant's payroll policies and practices at issue. The exchange of discovery allowed Class Counsel to conduct a full analysis of exposure.

3. The Parties engaged in arm's length negotiations at mediation with an experienced mediator, Daniel J. Turner, Esq. The Parties also engaged in post-mediation negotiations through the assistance of the mediator, after which settlement was reached.

4. The settlement in the case at bar warrants approval and carries a presumption of fairness. As previously noted in the application for Preliminary Approval, this current settlement was negotiated at arm's length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Class Members as a whole.

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

6. 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,

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

4 7. 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 throughout the State of California, including but not limited to the Los
7 Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County
8 Superior Courts, the San Diego County Superior Courts, and the United States District Courts for
9 the Central, Eastern, Northern, and Southern Districts of California.

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

26 9. My firm will have incurred costs in the amount of \$3,672.53 through the filing of
27 the Motion for Final Approval. The costs are all litigation-related costs, including filing fees,
28 court fees, messenger fees, mediation costs, and postage costs. Attached hereto as **Exhibit A** is

1 an inventory of the costs my firm has incurred in connection with prosecution of these lawsuits

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

4 Executed on April 20, 2026, at Los Angeles, California.

5 
6 _____
Larry W. Lee

EXHIBIT A



INVOICE

Diversity Law Group

515 South Figueroa Street, Suite 1250,
Los Angeles, California, 90071
lwlee@diversitylaw.com

Invoice # 10429
Invoice Date 04/16/2026
Terms Upon Receipt
Due Date 04/16/2026
PO #

Summary- Richardson, Chelsey v. Telecare Corporation - CA (18111.001)

Type	Description	Amount
Fees & Other Charges		0.00
Billed Time		0.00
Expenses		1,895.03

Subtotal: \$1,895.03
Discount: \$0.00
Subtotal after Discount:\$1,895.03
Taxable Subtotal: \$1,895.03
Tax: \$0.00
Total: \$1,895.03

Details - Richardson, Chelsey v. Telecare Corporation - CA (18111.001)

Expenses

Date	Category	Expense Code	Description	Amount (\$)
08/06/2024		Court fees	LWDALWDA	75.00
08/09/2024		Court fees	Odyssey - ComplaintOdyssey - Complaint	1,478.06
08/23/2024		Attorney Service	Attorney Service - Complaint Service	101.86
08/29/2024		Court fees	Odyssey - POS of SummonsOdyssey - POS of Summons	4.50
08/31/2024		Photocopies	PhotocopiesPhotocopies	0.25
08/31/2024		Postage	PostagePostage	8.69
10/04/2024		Court fees	Odyssey - Oppo to Mtn to StayOdyssey - Oppo to Mtn to Stay	4.50
10/15/2024		Court fees	Odyssey - Notice of Remote Appearance	4.50
10/17/2024		Court fees	Stanislaus Superior Remote Appearance	37.35
12/06/2024		Court fees	Odyssey - Notice of Related Case	4.50
02/20/2025	Court Fees		Odyssey - Notice of Change in Handling Attorney (Envelope #18329276)	5.95
09/04/2025	Court Fees		Odyssey - Joint Status Report (Envelope Number: 20736556)	25.64



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Invoice #	10429
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Terms	Upon Receipt
Due Date	04/16/2026
PO #	

Date	Category	Expense Code	Description	Amount (\$)
09/05/2025	Court Fees		Odyssey - Request to Cont CMC (Envelope Number: 20758222)	5.95
09/08/2025	Court Fees		Odyssey - Request to Cont CMC (Envelope Number: 20764789)	25.64
09/11/2025	Court Fees		Odyssey - NOE (Envelope Number: 20818767)	5.95
11/17/2025	Court Fees		Odyssey - Stip to file FAC (Envelope Number: 21630124)	37.71
11/18/2025	Court Fees		Odyssey - FAC (Envelope Number: 21654625)	17.70
12/01/2025	Court Fees		Odyssey - Stip Request for Continuance (Envelope Number: 21774147)	25.64
01/09/2026	Court Fees		Odyssey - Request to Vacate Status Conference (Envelope Number: 22215329)	25.64
Subtotal:				\$1,895.03
Total:				\$1,895.03



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lwlee@diversitylaw.com

Invoice # 10430
Invoice Date 04/16/2026
Terms Upon Receipt
Due Date 04/16/2026
PO #

Summary- Richardson, Chelsey v. Telecare Corporation - PAGA (18111.002)

Type	Description	Amount
Fees & Other Charges		0.00
Billed Time		0.00
Expenses		1,777.50

Subtotal: \$1,777.50
Discount: \$0.00
Subtotal after Discount:\$1,777.50
Taxable Subtotal: \$1,777.50
Tax: \$0.00
Total: \$1,777.50

Details - Richardson, Chelsey v. Telecare Corporation - PAGA (18111.002)

Expenses

Date	Category	Expense Code	Description	Amount (\$)
11/21/2024		Court fees	Odyssey - ComplaintOdyssey - Complaint	1,478.06
12/06/2024		Court fees	Odyssey - Notice of Related Case	4.50
01/13/2025	Attorney Service		ACE - Complaint Service	101.86
01/22/2025	Court Fees		Odyssey - POS of Summons	5.95
02/20/2025	Court Fees		Odyssey - Notice of Change in Handling Attorney (Envelope #18329544)	5.95
03/17/2025	Court Fees		Odyssey - CMS (Envelope #18623402)	5.95
04/01/2025	Court Fees		Stanislaus Superior Court Remote Appearance	37.35
05/01/2025	Court Fees		Odyssey - CMS (Envelope #19196359)	5.95
05/16/2025	Court Fees		Stanislaus Superior Remote Appearance	37.35
06/26/2025	Court Fees		Odyssey - Joint Status Review (Envelope Number: 19879904)	5.95
07/11/2025	Court Fees		Stanislaus Superior Court Remote Appearance	37.35
10/23/2025	Court Fees		Odyssey - Review Statement & Request for Cont (Envelope Number: 21341239)	25.64
02/06/2026	Court Fees		Odyssey - Stip to Cont CMC (Envelope # 22563165)	25.64



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Date	Category	Expense Code	Description	Amount (\$)
Subtotal:				\$1,777.50
Total:				\$1,777.50