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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

NATALIA TAN, as an individual and on behalf of all others similarly situated, and as a private attorney general,

Plaintiff,

vs.

ASURION INSURANCE SERVICES, INC., a Tennessee corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 24CV000032

[Hon. Jill H. Talley, Department 8A]

DECLARATION OF LARRY W. LEE IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT

Date:	November 20, 2026
Time:	9:00 a.m.
Department:	8A
Complaint Filed:	January 2, 2024

I, Larry W. Lee, declare as follows:

1. I am an attorney admitted to practice in the State of California and, with the law firm Diversity Law Group, P.C., am counsel of record for Plaintiff. I make this declaration on the basis of my own personal knowledge, except as to those matters stated on information and belief and, as to those matters, I believe them to be true. If called as a witness, I could testify competently as to the facts stated in this declaration.

2. Plaintiff's Counsel engaged in extensive factual investigation before settling, including the exchange of extensive informal and formal discovery and data. This allowed Plaintiff to conduct a full exposure analysis. The PAGA Settlement Agreement was the product of negotiation between highly able and experienced attorneys on both sides who possessed the relevant information and extensive legal research which they had carefully analyzed.

3. The settlement in the case at bar warrants approval and carries a presumption of fairness. 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 State.

4. My firm has a great deal of experience in wage and hour class and representative action litigation and has been approved as class counsel in a number of wage and hour class actions.

5. 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, 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, including wage and hour class actions.

6. 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. 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.

7. Since at least January 1, 2024, my hourly rate for plaintiff's work has been $900.00 per hour. I have been approved at this hourly rate of $900.00 by numerous Courts, including, but not limited to *Jordan v. Mondelez Global LLC* (San Bernardino County Case No. CIVSB2202758), *Sims v. QG Printing II, LLC, et al.* (C.D. Cal., Case No. ED CV 20-1632-DMG), and *Westmoreland v. Kindercare Education LLC* (N.D. Cal. Case No. 3:23-cv-03168-JD).

8. As of January 1, 2026, I increased my hourly rate for plaintiff's work to $1,000 per hour based on my experience and work history as an attorney who has practiced for nearly twenty-five (25) years in the Los Angeles area.

9. To date, I have incurred approximately 25.7 hours in the prosecution of this matter, with an hourly rate of $1,000.00 per hour. The total lodestar for my hours will be approximately $25,700.00. Attached as **Exhibit A** is a summary of my hours and tasks on this matter.

10. Plaintiff has signed a fee-split agreement with their counsel for purposes of sharing any fees awarded by this Court. The fee-split is as follows: 65% to Diversity Law Group, P.C. and 35% to Polaris Law Group.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 22nd day of October 2026, at Los Angeles, California.



Larry W. Lee

EXHIBIT A

Time and Task Summary
for Tan v. Asurion Insurance Services, Inc.
Larry W. Lee

Description of Work	Hours
Review client documents; research potential claims	2.1
Draft PAGA letter; review and edit Complaint	2.3
Review and revise demand for arbitration	1.1
Research potential arbitrators	2.3
Review and revise first set of written discovery to defendant; review responses to same; review document production for same	1.8
Review motion for summary adjudication; review and revise opposition to same; review reply re same; legal research re same	6.2
Review data produced by Defendant and perform damages analysis for mediation	1.9
Review and edit mediation brief	3.8
Review and edit settlement agreement	1.7
Review and edit Motion for Approval of PAGA settlement	2.5
TOTAL	**25.7**