

ELECTRONICALLY FILED

Superior Court of California,
County of Alameda

12/22/2025 at 02:03:49 PM

By: Shabira Iyamu,
Deputy Clerk

Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

DONTE BOOZE, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

AIR LIQUIDE ADVANCED MATERIALS,
INC., a Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No. 24CV060686

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

Date: January 15, 2026

Time: 10:00 a.m.

Department: 18

Reservation No. 318479431349

Complaint Filed: January 19, 2024

DONTE BOOZE, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

AIR LIQUIDE ADVANCED MATERIALS,
INC., a Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

1 William L. Marder (SBN 170131)
2 bill@polarislawgroup.com
3 **POLARIS LAW GROUP**
4 501 San Benito Street, Suite 200
5 Hollister, CA 95023
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Attorneys for Plaintiff and the Class

1 I, Larry W. Lee, declare as follows:

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

7 2. The Notice of Class Action Settlement (“Class Notice”) provided Class Members with
8 my office’s contact information, where they could further seek information regarding the class
9 settlement, leave questions for the Administrator, and update their address.

10 3. There were no objections to the amount of attorneys’ fees or litigation costs that Class
11 Counsel seek in this case and for which Plaintiffs ask the Court for final approval.

12 4. Class Counsel engaged in extensive factual investigation before settling, including the
13 exchange of extensive informal discovery and class data. This allowed Plaintiffs to conduct a full
14 damage analysis. The Agreement was the product of negotiation between highly able and experienced
15 attorneys on both sides who possessed the relevant data and extensive legal research which they had
16 carefully analyzed.

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

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

23 7. I am one of the primary attorneys on this matter. My qualifications are as follows: I
24 received my J.D. from Arizona State University College of Law in 2003. During law school, I was a
25 summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude from Arizona
26 State University College of Law in the top 10% of my class. While I was in law school, I was the
27 Associate Managing Editor of the Arizona State University College of Law, Law Journal. Upon
28 graduation, I practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash

1 Smoak & Stewart, P.C., a national employment defense law firm that represents a significant number of
2 Fortune 500 companies, including wage and hour class actions.

3 8. My firm's primary focus is employment law. I have handled a number of wage and hour
4 matters including class actions and individual actions, on both plaintiff and defense sides. I have a
5 practice that encompasses cases throughout the State of California, including but not limited to the Los
6 Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior
7 Courts, the San Diego County Superior Courts, and the United States District Courts for the Central,
8 Eastern, Northern, and Southern Districts of California. I have been named as Class Counsel in a
9 number of class actions that have been granted final approval by the Superior Courts of Los Angeles
10 County, Orange County, San Francisco County, Alameda County, Contra Costa County, Monterey
11 County, San Bernardino County, Santa Clara County, Sonoma County, and the United States District
12 Court for the Central, Eastern, and Northern Districts of California.

13 9. To date, I have incurred approximately 155.9 hours in the prosecution of this matter, with
14 an hourly rate of \$900.00 per hour. I anticipate spending an additional 5 hours through final approval
15 and post-approval, including conferring with class members, defense counsel, and the administrator as
16 well as post-judgment compliance matters. The total lodestar for my hours will be approximately
17 \$144,810.00. Attached as **Exhibit A** is a summary of my hours and tasks on this matter.

18 10. I have been approved at an hourly rate of \$850.00 by various courts in a number of
19 matters, including most recently in *Audycki v. Stanford Health Care*, Santa Clara Superior Court Case
20 No. 19CV347173; *Palomino v. Northrop Grumman Systems Corporation*, Santa Clara Superior Court
21 Case No. 19CV345534; *Lahey v. Poshmark, Inc.*, Santa Clara Superior Court, Case No. 22CV395084;
22 and *Medina v. United Airlines, Inc.*, Los Angeles Superior Court, Case No. BC624742. As of January 1,
23 2024, my hourly rate for class and representative actions increased to \$900.00 per hour, which is typical
24 of attorneys in the community that have been practicing for over 20 years. Indeed, I have personal
25 knowledge, many of my colleagues and opposing counsel are currently billing at rates much higher than
26 \$900.00 per hour. Further, I have been approved at an hourly rate of \$900.00 in *Jordan v. Mondelez*
27 *Global LLC*, San Bernardino County Case No. CIVSB2202758; *Bolding v. Cardinal Financial*
28 *Company*, San Bernardino County Case No. CIVSB2206543.

1 11. My firm has incurred costs in the amount of \$12,380.35. The costs are all litigation
2 related costs, including filing fees. Attached hereto as **Exhibit B** is copy of the costs my firm has
3 incurred in connection with prosecution of this lawsuit.

4 12. On September 10, 2025, Plaintiff uploaded the Order Granting Plaintiff's Motion for
5 Preliminary Approval of Class Action Settlement to the LWDA's website. Concurrent with the filing of
6 this motion, Plaintiffs also have uploaded the final approval motion to the LWDA.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 true and correct. Executed this 19th day of December 2025, at Los Angeles, California.

9 

10 _____
Larry W. Lee

EXHIBIT A

Booze v. Air Liquide Advanced Materials
Superior Court of the State of California – County of Alameda
Case No. 24CV060686
Case No. 24CV068970
Time and Task Chart – Larry W. Lee

Hours	Description of Work
2.8	Review client documents and potential claims; confer with client re same
.8	Draft PAGA letter
5.5	Draft Class Action Complaint and research causes of action in preparation for same
4.7	Review Notice of Removal of Class Action and supporting documents; research issues re potential remand
3.4	Draft PAGA Complaint and notice of related cases
1.3	Review Answers to Class and PAGA Complaints
3.1	Draft initial disclosures
3.2	Prepare written discovery for Class Action case
1.1	Research magistrate judge; prepare consent/declination re same; review reassignment orders
4.9	Review defendant's discovery responses; meet and confer re same
4.2	Prepare FRCP 30b6 deposition notice; review objections to same; meet and confer re same
3.8	Meet and confer with counsel re potential mediation and stipulation to stay case pending mediation; review and revise stipulation re same
.8	Meet and confer with defense regarding mediator selection and potential dates for first mediation and class data for mediation
2.1	Review/revise Joint CMC Statements and exchange emails with opposing counsel regarding the same
6.4	Review class data produced by defendant for mediation; prepare damage analysis for same
12.7	Draft mediation brief for first mediation
8.9	Attend first mediation
3.8	Attend second mediation
6.6	Review Defendant's motion to compel arbitration and supporting documents
14.2	Draft opposition to motion to compel arbitration; legal research re same
3.4	Review defendant's reply brief re motion to compel arbitration; legal research re

Hours	Description of Work
	same
1.5	Meet and confer re continuation of class cert deadline; review and revise stipulation for same
4.2	Further settlement discussions with mediation and defendants
.7	Review and revise stipulation for remand
2.2	Draft stipulation to consolidate class and PAGA actions; meet and confer re same; review and revise same
3.6	Draft MOU; confer with counsel and client re same; review and revise MOU
1.7	Confer with counsel regarding selection of settlement administrator; review bids from same
8.4	Review/revise Long Form Settlement Agreement, Class Notice; confer with counsel and client re same
9.5	Draft Motion for Preliminary Approval; Declarations in Support of Preliminary Approval; review and revise same; confer with counsel re same
1.4	Review Court's Tentative Ruling re: Preliminary Approval and confer with counsel
5.6	Draft amendment to settlement agreement and supplemental brief re same; confer with counsel re same
1.7	Confer with administrator and counsel re settlement issues
2.0	Review weekly admin reports
4.4	Confer with class members regarding the settlement process
11.3	Draft Motion for Final Approval, Declaration of Plaintiff, supporting declaration and Proposed Order; confer with administrator and counsel re same; review and revise same
155.9	TOTAL HOURS

EXHIBIT B



Invoice

Diversity Law Group

515 South Figueroa Street, Suite 1250, Los Angeles, California, 90071

lwlee@diversitylaw.com

Invoice #: 10316

Invoice Date: 12/17/2025

Terms: Upon Receipt

Due Date: 12/17/2025

PO #:

Invoice Total: \$11,730.20

Payment Applied: \$0.00

Total Due: \$11,730.20

Summary - Booze, Donte v. Air Liquide Advanced Materials Inc. - CA (2101.001)

Type	Description	Amount (\$)
Expenses		11730.20

Subtotal: \$11,730.20

Discount: \$0.00

Subtotal \$11,730.20

after

Discount:

Taxable \$11,730.20

Subtotal:

Tax: \$0.00

Total: \$11,730.20

Details - Booze, Donte v. Air Liquide Advanced Materials Inc. - CA (2101.001)

Expenses

Date	Category	Expense Code	Description	Amount (\$)
01/19/2024		Court fees	ACE E Filing - ComplaintACE E	1495.90



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Invoice #: 10316

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PO #:

Invoice Total: \$11,730.20

Payment Applied: \$0.00

Total Due: \$11,730.20

			Filing - Complaint	
01/24/2024		Court fees	ACE E Filing - Notice of Related Case	17.85
01/31/2024		Photocopies	PhotocopiesPhotocopies	0.50
01/31/2024		Postage	PostagePostage	8.53
02/02/2024		Attorney Service	Attorney Service - Complaint Service	83.24
02/13/2024		Court fees	ACE E Filing - POS of Summons	17.85
02/15/2024		Court fees	ACE E Filing - Notice of Order re Related	17.85
02/20/2024		Court fees	ACE E Filing Notice of Reassignment	17.85
02/29/2024		Photocopies	PhotocopiesPhotocopies	4.50
02/29/2024		Postage	PostagePostage	1.12
05/03/2024		Court fees	ACE E Filing - CMSACE E Filing - CMS	17.85
09/26/2024		Arbitrators/mediators	JAMS MediationJAMS Mediation	4750.00
10/15/2024		Arbitrators/mediators	JAMS MediationJAMS Mediation	4750.00
03/12/2025	Court Fees		ACE E Filing - Joint Stip to Consolidate (Filing ID 11783835)	41.00
05/06/2025	Court Fees		MPA Reservation	1.00
05/06/2025	Court Fees		ACE EFiling - CMS (Filing ID 12108253)	20.40
07/16/2025	Court Fees		ACE EFiling - MPA (Filing ID 12515740)	82.20
07/23/2025	Court Fees		ACE EFiling - Joint CMS (Filing ID 12562334)	20.40
07/24/2025	Court Fees		ACE - Chamber Copy	107.76
08/19/2025	Court Fees		ACE EFiling - Supp Decl of LWL	20.40



Diversity Law Group

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Invoice

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Terms: Upon Receipt

Due Date: 12/17/2025

PO #:

Invoice Total: \$11,730.20

Payment Applied: \$0.00

Total Due: \$11,730.20

			iso MPA (Filing ID 12719885)	
09/10/2025	Court Fees		Alameda Online Order re MPA	4.00
12/17/2025	Court Fees		WIP - Final Approval Filing/Service	250.00
Subtotal:				\$11,730.20
Total:				\$11,730.20



Invoice

Diversity Law Group

515 South Figueroa Street, Suite 1250, Los Angeles, California, 90071

lwlee@diversitylaw.com

Invoice #: 10319

Invoice Date: 12/17/2025

Terms: Upon Receipt

Due Date: 12/17/2025

PO #:

Invoice Total: \$650.15

Payment Applied: \$0.00

Total Due: \$650.15

Summary - Booze, Donte v. Air Liquide Advanced Materials Inc. - PAGA (2101.003)

Type	Description	Amount (\$)
Expenses		650.15

Subtotal: \$650.15

Discount: \$0.00

Subtotal \$650.15
after
Discount:

Taxable \$650.15

Subtotal:

Tax: \$0.00

Total: \$650.15

Details - Booze, Donte v. Air Liquide Advanced Materials Inc. - PAGA (2101.003)

Expenses

Date	Category	Expense Code	Description	Amount (\$)
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Invoice

Diversity Law Group

515 South Figueroa Street, Suite 1250, Los Angeles, California, 90071

lwlee@diversitylaw.com

Invoice #: 10319

Invoice Date: 12/17/2025

Terms: Upon Receipt

Due Date: 12/17/2025

PO #:

Invoice Total: \$650.15

Payment Applied: \$0.00

Total Due: \$650.15

01/16/2024		Court fees	LWDALWDA	75.00
03/25/2024		Court fees	ACE E Filing - Complaint [1495.90 - 1000	495.90
04/26/2024		Court fees	ACE E Filing - N&A & POS of Summons	17.85
02/03/2025	Court Fees		ACE E Filing - CMS	20.40
03/12/2025	Court Fees		ACE E Filing - Joint Stip to Consolidate (Filing ID 11783884)	41.00
Subtotal:				\$650.15
Total:				\$650.15