

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Max W. Gavron (State Bar No. 291697)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com
kagnew@diversitylaw.com
mgavron@diversitylaw.com

Attorneys for Plaintiff Semaj Graham

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

SEMAJ GRAHAM as individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

4283929 DELAWARE LLC; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 24STCV19351

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

Date: March 30, 2026

Time: 10:00 a.m.

Dept.: 7

Action Filed: August 2, 2024

Trial Date: None Set

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

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and am with the law firm Diversity Law Group, P.C., counsel of record for Plaintiff
4 Semaj Graham (“Plaintiff”). I have personal knowledge of the facts set forth below and if called
5 to testify I could and would do so competently.

6 **FAIRNESS OF THE SETTLEMENT**

7 2. I am one of the primary attorneys of record for Plaintiff in this action and have
8 been actively involved in the investigation, prosecution, evaluation, and settlement of this case.
9 Based on my personal knowledge of the litigation, the Class Action and PAGA Settlement
10 Agreement (“Settlement Agreement” or “Agreement”) is the product of informed, arm’s-length
11 negotiations between experienced counsel on both sides. Before agreeing to settle, Class Counsel
12 conducted substantial factual investigation and legal analysis. Among other things, Class
13 Counsel analyzed time and payroll data, reviewed relevant employment policies and records,
14 researched the applicable law and defenses, and assessed the risks associated with continued
15 litigation, class certification, trial, and possible appeal. The Parties also participated in a full-day
16 mediation before experienced mediator Darren M. Cohen. The mediation process was
17 meaningful and adversarial, and it materially assisted the Parties in evaluating their respective
18 positions and ultimately reaching the settlement reflected in the Agreement. Based on the
19 investigation performed, the information exchanged, and my experience litigating wage-and-
20 hour class and representative actions, I believe the Settlement Agreement is fair, reasonable, and
21 adequate.

22 3. All work performed by Diversity Law on this matter was done on a contingency
23 basis. The Firm has received no compensation for the time invested or expenses incurred in
24 litigating this case. The Firm has prosecuted this litigation up to this point, taking the risk that it
25 ultimately would be faced with not receiving any compensation for our work.

26 **CLASS COUNSEL’S EXPERIENCE**

27 4. My qualifications are as follows: I received my J.D. from Arizona State
28 University College of Law in 2003. During law school, I was a summer associate at the law firm

1 of Brobeck, Phleger & Harrison. I graduated *cum laude* from Arizona State University College
2 of Law in the top 10% of my class. While I was in law school, I was the Associate Managing
3 Editor of the Arizona State University College of Law, Law Journal. Upon graduation, I
4 practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash
5 Smoak & Stewart, P.C., a national employment defense law firm that represents a significant
6 number of Fortune 500 companies.

7 5. My firm's primary focus is employment law. I have handled a number of wage
8 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
9 encompasses cases throughout the State of California, including but not limited to the Los
10 Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County
11 Superior Courts, the San Diego County Superior Courts, and the United States District Courts for
12 the Central, Eastern, Northern, and Southern Districts of California.

13 6. I have been named as class counsel in a number of class actions that have been
14 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
15 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
16 County, Santa Clara County, Sonoma County, and other counties, as well as the United States
17 District Court for the Central, Eastern, and Northern Districts of California, including but not
18 limited to the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
19 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
20 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
21 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
22 Judicial Council Coordination Proceeding No. 4480; *Hernandez v. CVS Corp. et al.*, Judicial
23 Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior
24 Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey Peninsula*,
25 Monterey County Superior Court Case No. 17CV003452; *DirectV Wage and Hour Cases*, Santa
26 Clara Superior Court Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard*
27 *Drywall, Inc.*, Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget*
28

1 *Market, Inc.*, Yolo County Superior Court Case No. CV-18-558.

2 **ATTORNEYS' FEES**

3 7. To date, I have incurred approximately 21.50 hours in connection with the
4 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred
5 to date.

6 8. As of January 1, 2024, my hourly rate in class and representative actions is \$900
7 per hour. Accordingly, the total lodestar for my hours will be approximately \$19,350 (21.50
8 hours x \$900.00). I was approved at an hourly rate of \$900 in the matter of *Jose Valencia v.*
9 *Sentinel Transportation, LLC*, Santa Barbara Superior Court Case No. 22CV00951; *Robert*
10 *Jordan v. Mondelez Global LLC*, San Bernardino Superior Court Case No. CIVSB2202758; *In re*
11 *Humano Wage and Hour Cases*, Judicial Council Coordination Proceeding Case No. 5240; and
12 *Justin Bui v. The Ranch Steakhouse and Saloon, Inc. and RGB Systems, Inc.*, Santa Clara
13 Superior Court Case No. 24CV439149. I have previously been approved at an hourly rate of
14 \$850 by various courts in a number of matters, including most recently in *Audycki v. Stanford*
15 *Health Care*, Santa Clara Superior Court Case No. 19CV347173 and *Palomino v. Northrop*
16 *Grumman Systems Corporation*, Santa Clara Superior Court Case No. 19CV345534.

17
18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct.

20 Executed on this 6th day of March 2026, at Los Angeles, California.

21 
22 _____
23 Larry W. Lee

EXHIBIT A

Graham v. West Coast Pet Memorial
Superior Court of the State of California, County of Los Angeles, Case No. 24STCV19351
Time and Task Chart for Larry W. Lee

Hours	Description of Work
3.50	Review memorandum to file regarding client intake; review PAGA notice and initial complaint; confer with co-counsel regarding proposed revisions to filings.
1.10	Review of Defendant's arbitration agreement; confer with co-counsel regarding enforceability of agreement and related strategic considerations
1.40	Confer with co-counsel regarding mediation strategy and the scope of informal discovery needed to evaluate class time and payroll data for mediation purposes.
1.80	Review and analyze exposure assessment; confer with co-counsel regarding underlying assumptions, valuation issues, and settlement negotiation strategy.
5.30	Review Plaintiffs' joint mediation statement; confer with co-counsel throughout mediation regarding settlement positions, mediator feedback, and negotiation strategy.
1.00	Review memorandum of understanding; confer with co-counsel regarding terms and proposed revisions.
2.60	Review long form settlement agreement; confer with co-counsel regarding proposed revisions to the settlement terms.
1.50	Review motion for preliminary approval; confer with co-counsel regarding proposed revisions to the motion.
1.00	Review tentative order regarding motion for preliminary approval; confer with co-counsel regarding proposed modifications to settlement agreement; review amended settlement agreement.
2.30	Review motion for final approval; confer with co-counsel regarding proposed revisions.
21.50	<u>TOTAL HOURS</u>