

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Max W. Gavron (State Bar No. 291697)
Kwanporn “Mai” Tulyathan (State Bar No. 316704)
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
ktulyathan@diversitylaw.com

William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
(831) 531-4214
(831) 634-0333 facsimile

Attorneys for Plaintiff, the Class, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

KALU EKEH, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

QUALITY TECHNOLOGY SERVICES,
LLC, a Delaware limited liability
company; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 24CV019854

(Assigned to the Hon. Jill H. Talley, Dept. 8A)

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

Date: June 26, 2026

Time: 9:00 a.m.

Dept.: 8A

Action Filed: September 30, 2024

Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

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 Plaintiff Kalu (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I would do so competently.

3. The Joint Stipulation of Class Action Settlement and Release and the Amendment to Joint Stipulation of Class Action Settlement and Release (together, the “Agreement” or “Settlement Agreement”) was the product of negotiations between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. Class Counsel engaged in extensive factual investigation before settling, including exchanging information discovery, reviewing class and PAGA data, and reviewing Defendant’s pertinent policies and practices relevant to valuing this case. This allowed Plaintiff to conduct a full damage analysis. The Parties also engaged in arm’s-length negotiations at mediation with the Hon. Peter H. Kirwan (Ret.), which resulted in this settlement.

5. Any remaining monies from uncashed settlement checks will be distributed to the *cypres* recipient Legal Aid at Work, in accordance with Code of Civil Procedure § 384. I do not have any relationship with or connection to said organization.

2

1 Defendant's counsel to obtain informal data and documents and to discuss the merits of the
2 claims on behalf of the Settlement Class. This settlement was obtained for the benefit of the
3 Settlement Class, as opposed to the individual Class Representative.

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

6 8. I am one of the primary attorneys on this matter. My qualifications are as follows:
7 I received my J.D. from Arizona State University College of Law in 2003. During law school, I
8 was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated *cum laude*
9 from Arizona State University College of Law in the top 10% of my class. While I was in law
10 school, I was the Associate Managing Editor of the Arizona State University College of Law,
11 Law Journal. Upon graduation, I practiced law as an associate at the Los Angeles County offices
12 of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm that
13 represents a significant number of Fortune 500 companies.

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

20 10. I have been named as class counsel in a number of class actions that have been
21 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
22 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
23 County, Santa Clara County, Sonoma County, and other counties, as well as the United States
24 District Court for the Central, Eastern, and Northern Districts of California, including but not
25 limited to the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
26 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
27 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
28 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,

Judicial Council Coordination Proceeding No. 4480; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court Case No. CV-18-558.

11. To date, I have incurred approximately 37.8 hours in connection with the litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred to date.

12. The total lodestar for my hours will be approximately **\$34,020.00**, based on the above total hours of 37.8 at an hourly rate of \$900.00 per hour.

13. My current billing rate is \$900.00 per hour. I have been approved at an hourly rate of \$850.00 per hour by various courts, including *Stephenson v. Healthcare Services, Inc.*, Orange County Superior Court Case No. 30-2019-01078609-CU-OE-CXC, *Lakey v. Poshmark, Inc.*, Santa Clara Superior Court, Case No. 22CV395084; *Audycki v. Stanford Health Care*, Santa Clara Superior Court Case No. 19CV347173; *Palomino v. Northrop Grumman Systems Corporation*, Santa Clara Superior Court Case No. 19CV345534; *Lakey v. Poshmark, Inc.*, Santa Clara Superior Court, Case No. 22CV395084; *Stephenson v. Healthcare Services, Inc.*, Orange County Superior Court Case No. 30-2019-01078609-CU-OE-CXC; and *Medina v. United Airlines, Inc.*, Los Angeles Superior Court, Case No. BC624742.

14. As of January 1, 2024, my hourly rate for class and representative actions increased to \$900.00 per hour. I was approved at an hourly rate of \$900.00 in *Abernathy v. Deacon Construction, LLC*, Santa Clara Superior Court Case No. 20CV367327, *Jordan v. Mondelez Global LLC*, San Bernardino Superior Court Case No. CIVSB2202758, *Westmoreland v. Kindercare Education LLC* (N.D. Cal. Case No. 3:23-cv-03168-JD), *Chiesa et al. v. Airgas USA, LLC* (Sacramento County Superior Court Lead Case No. 34-2022-00325292).

I declare under penalty of perjury under the laws of the State of California that the

1 foregoing is true and correct.

2 Executed on this 3rd day of June 2026, at Los Angeles, California.

3
4 
5 _____
6 Larry W. Lee

EXHIBIT A

Ekeh v. Quality Technology Services, LLC
Time and Task Chart – Larry W. Lee

Hours	Description of Work
5.8	Initial meeting with co-counsel and client; review client documents; review PAGA letter
3.0	Review and revise complaint, FAC, and SAC, and TAC; research causes of action in preparation for same
2.6	Confer with counsel re potential mediation and necessary class data for same
5.2	Review mediation data and exposure analysis
4.0	Review/revise mediation brief
3.7	Review and revise MOU; confer with counsel re same
5.1	Review and revise Long Form Settlement Agreement
3.5	Review and revise motion for preliminary approval
1.5	Meet and confer with Defendant's counsel re: escalator clause; review calculations from settlement administrator
2.8	Review and revise Motion for Final Approval and supporting documents
37.8	TOTAL HOURS