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Attorneys for Plaintiff and the Class

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

CHRISTIE MINES, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SOUTHERN MONTEREY COUNTY
MEMORIAL HOSPITAL, a California
nonprofit corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 24CV005289

Assigned to the Honorable Thoman W. Wills, Dept.
15)

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

Date: April 10, 2026

Time: 8:30 A.M.

Dept.: 15

Action Filed: December 12, 2024

Trial Date: Not Set

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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 The Mines (“Plaintiff”). I have personal knowledge of the facts set forth below and if called upon I could and would do so competently.

3. The Joint Stipulation of Class and PAGA Settlement (“Stipulation” or “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. The Parties engaged in arm’s length negotiations.

5. I have spent significant time researching and pursuing the claims that have been alleged in this action. Based on my independent investigations and evaluations, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Settlement Class, in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arm's length by experienced attorneys. Thus, this settlement should be granted final approval.

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

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1 9. I have been approved at an hourly rate of at least \$850.00 per hour by various
2 courts, including *Stephenson v. Healthcare Services, Inc.*, Orange County Superior Court Case
3 No. 30-2019-01078609-CU-OE-CXC, *Lakey v. Poshmark, Inc.*, Santa Clara Superior Court,
4 Case No. 22CV395084; *Audycki v. Stanford Health Care*, Santa Clara Case No. 19CV347173;
5 *Palomino v. Northrop Grumman Systems Corporation*, Santa Clara Superior Court Case No.
6 19CV345534; *Lakey v. Poshmark, Inc.*, Santa Clara Superior Court, Case No. 22CV395084;
7 *Stephenson v. Healthcare Services, Inc.*, Orange County Superior Court Case No. 30-2019-
8 01078609-CU-OE-CXC; and *Medina v. United Airlines, Inc.*, Los Angeles Superior Court, Case
9 No. BC624742.

10 10. As of January 1, 2024, my hourly rate for class and representative actions
11 increased to \$900.00 per hour. I was approved at an hourly rate of \$900.00 in *Abernathy v.*
12 *Deacon Construction, LLC*, Santa Clara Superior Court Case No. 20CV367327, and *Jordan v.*
13 *Mondelez Global LLC*, San Bernardino Superior Court Case No. CIVSB2202758.

14 11. Although I believe \$900.00 per hour is a reasonable rate for my services, as it has
15 been approved throughout California, in this motion, I request a reduced hourly rate of \$595.00,
16 which considers the jurisdiction where this Action was litigated. Accordingly, the total lodestar
17 for my hours will be approximately \$5,593.00 based on an hourly rate of \$595.00 per hour [(9.4
18 hours) x \$595.00].

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

27 13. My firm's primary focus is employment law. I have handled a number of wage
28 and hour matters including class actions and multiple-plaintiff actions. I have a practice that

encompasses cases in 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.

14. 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, and the United States District Court for the Central District of California, including the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial Council Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC392717; *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.

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

Executed on this 18th day of March 2026, at Los Angeles, California.


Larry W. Lee

EXHIBIT A

Mines v. Southern Monterey County Memorial Hospital
Larry W. Lee Time and Task Chart

Hours	Description of Work
0.9	Confer with client and co-counsel re theories of liability; legal research and strategy re same; analyze and review client documents to prepare for same.
1.0	Further draft and revise data requests to participate in settlement discussions; confer with co-counsel re same.
2.5	Analyze and review time and pay data produced in advance of negotiations; confer with co-counsel re same; confer with co-counsel re negotiations with defense counsel.
3.5	Further draft and revise settlement agreement; confer with co-counsel and defense counsel re same.
1.0	Further revise motion for preliminary approval and documents in support of same.
0.5	Further revise motion for final approval and documents in support of same.
9.4	TOTAL HOURS