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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
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: November 21, 2025

Time: 8:30 A.M.

Dept.: 15

Action Filed: December 12, 2024

Trial Date: Not Set

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I, Larry W. Lee, declare as follows:

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

2. From the inception of the case, Class Counsel have zealously represented the interests of the Settlement Class. The settlement was obtained for the benefit of the Settlement Class, as opposed to the individual Class Representative. Further, Class Counsel have been approved as class counsel on a number of prior cases, have litigated numerous other class action cases, and are competent to represent the Settlement Class.

3. Both Plaintiff's and Defendant's counsel have a great deal of experience in wage and hour class action litigation. Plaintiff's counsel have been approved as class counsel in a number of wage and hour class actions.

4. Based on my review of all the information, and based on my experience in class action litigation, I believe this settlement to be fair, adequate, and reasonable.

5. I was retained based upon a contingency fee arrangement wherein Plaintiff's counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiff failed to prevail in this case counsel for Plaintiff would have spent a significant amount of time, money and other resources without any benefit or return. In addition, had Plaintiff also failed to prevail in the present cases, Defendant would have been able to seek costs in connection with their defense of the case.

6. I have spent significant time researching and pursuing the claims that have been alleged in this action. The Parties engaged in formal and informal discovery, including the exchange of class data.

7. 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*

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

6 8. My firm's primary focus is employment law. I have handled a number of wage
7 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
8 encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the
9 San Francisco County Superior Courts, the San Diego County Superior Courts, and the United
10 States District Courts for the Central, Eastern, Northern, and Southern Districts of California.

11 9. I have been named as class counsel in a number of class actions that have been
12 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
13 Francisco County, and the United States District Court for the Central District of California,
14 including the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
15 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
16 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
17 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
18 Judicial Council Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior
19 Court Case No. BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination
20 Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-
21 00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County Superior
22 Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court
23 Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda
24 County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County
25 Superior Court Case No. CV-18-558.

26 10. I do not have any conflict of interest with the proposed *cy pres* recipient, Legal
27 Aid at Work

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

foregoing is true and correct.

Executed on this 29th day of October 2025, at Los Angeles, California.



Larry W. Lee