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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

JOSEPH GUEVARA, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

GLOBAL MAIL, INC., an Ohio corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 21STCV12053

[Hon. David S. Cunningham, Dept. 11]

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

Date: April 24, 2023
Time: 10:00 a.m.
Department: 11

Complaint Filed: March 29, 2021

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 Plaintiff asks the Court for final approval.

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

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

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

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

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. My firm has incurred costs in the amount of \$11,393.95. The costs are all litigation
14 related costs, including filing fees and mediation fees. Attached hereto as **Exhibit A** is copy of the costs
15 my firm has incurred in connection with prosecution of this lawsuit.

16 10. To date, I have incurred approximately 61.1 hours in the prosecution of this matter, with
17 an hourly rate of \$800.00 per hour. I anticipate spending an additional 10.0 hours through final approval
18 and post-approval, including conferring with class members, defense counsel, and the administrator, as
19 well as appearing for the hearing of the Motion for Final Approval. The total lodestar for my hours will
20 be approximately \$56,880.00. Attached as **Exhibit B** is a summary of my hours and tasks on this matter.
21 Since at least 2020, I have been approved at an hourly rate of \$750.00 per hour by various Courts,
22 including this Court. Examples of these Courts include the following cases: *Hernandez v. Wells Fargo*
23 *Bank*, Santa Clara County Superior Court Case No. 16CV299319, *Carrillo v. New Balance Athletics,*
24 *Inc.*, Santa Clara County Superior Court Case No. 19CV352469; *Ramirez v. Walgreen Co.*, United
25 States District Court, Northern District of California Case No. 18-cv-03921-EJD, *Chavez v. Converse,*
26 *Inc.*, United States District Court, Northern District of California Case No. 15-cv-03746-NC; *Foster v.*
27 *Schindler Elevator Corporation*, Alameda County Superior Court Case No. RG19029640; *Foaad Hanna*
28 *v. Equinix, LLC*, Santa Clara County Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven*

1 *LLC*, Los Angeles County Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville*
2 *Community Hospital*, Santa Cruz County Superior Court Case No. 18CV00191; *Pittman v. Martinez*
3 *Steel Corporation*, San Bernardino County Superior Court Case No. CIVDS1823132; *Michael Randolph*
4 *v. Pacific Racing Association*, Alameda County Superior Court Case No. RG18908139; *Markham v.*
5 *Quik Stop Markets, Inc.*, Santa Clara Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*,
6 Ventura Superior Court Case No. 56-2019-005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San
7 Bernardino Superior Court Case No. CIVDS1828867, and *Prexxie Pascual and Arturo Fonseca v.*
8 *Satellite Healthcare, Inc.*, Santa Clara Superior Court Case No. 19CV345211.

9 11. On January 26, 2023, Plaintiff uploaded the Order Granting Plaintiff's Motion for
10 Preliminary Approval of Class Action Settlement to the LWDA's website. Concurrent with the filing of
11 this motion, Plaintiff also has uploaded the final approval motion to the LWDA.

12 12. I understand that the attorneys' fees awarded in this action will be split 50% to Diversity
13 Law Group, P.C. and 50% to Hyun Legal, APC. I consent to this split.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing is
15 true and correct. Executed this 28th day of March 2023, at Los Angeles, California.

16 

17 _____
Larry W. Lee

EXHIBIT A

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DIVERSITY LAW GROUP
Slip Listing

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Selection Criteria

Slip Classification Open
Client (hand select) Include: Guevara, Joseph v. Global Mail
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
66684	EXP	Linda Lee	1	75.00	75.00
3/25/2021		Court fees			
WIP		Guevara, Joseph v. Global M			
LWDA					
66685	EXP	Linda Lee	1	38.00	38.00
3/25/2021		Online researc			
WIP		Guevara, Joseph v. Global M			
Online LASC					
66826	EXP	Olympia	1	1630.95	1630.95
3/29/2021		Atty Service			
WIP		Guevara, Joseph v. Global M			
Attorney Service - Complaint					
67007	EXP	Olympia	1	6.96	6.96
3/31/2021		Postage			
WIP		Guevara, Joseph v. Global M			
Postage					
67197	EXP	Olympia	1	76.99	76.99
4/26/2021		Atty Service			
WIP		Guevara, Joseph v. Global M			
Attorney Service - Complaint Service					
67452	EXP	Erika Mejia	1	86.34	86.34
5/3/2021		Atty Service			
WIP		Guevara, Joseph v. Global M			
Attorney Service - Notice of ISC					
67453	EXP	Erika Mejia	1	53.70	53.70
5/4/2021		Atty Service			
WIP		Guevara, Joseph v. Global M			
Attorney Service - POS of Summons					
67492	EXP	Olympia	1	53.70	53.70
5/20/2021		Atty Service			
WIP		Guevara, Joseph v. Global M			
Attorney Service - Initial CMS					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
67508	EXP	Olympia	1	53.70	53.70
5/28/2021		Atty Service			
WIP		Guevara, Joseph v. Global M			
Attorney Service - FAC					
67669	EXP	Olympia	29	0.25	7.25
5/31/2021		Photocopies			
WIP		Guevara, Joseph v. Global M			
Photocopies					
67670	EXP	Olympia	1	2.91	2.91
5/31/2021		Postage			
WIP		Guevara, Joseph v. Global M			
Postage					
69134	EXP	Olympia	1	77.20	77.20
9/7/2021		Atty Service			
WIP		Guevara, Joseph v. Global M			
Attorney Service - Notice of ISC					
69079	EXP	Olympia	1	12.07	12.07
9/28/2021		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Notice of Reassignment & CMC					
69196	EXP	Olympia	1	12.07	12.07
10/8/2021		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Notice of Cont					
69322	EXP	Olympia	1	12.07	12.07
10/14/2021		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Notice of SC					
69861	EXP	Olympia	1	7500.00	7500.00
12/3/2021		Arbitrators			
WIP		Guevara, Joseph v. Global M			
Steven G. Pearl Mediation					
70077	EXP	Olympia	1	141.60	141.60
12/9/2021		Court fees			
WIP		Guevara, Joseph v. Global M			
Case Anywhere					
71100	EXP	Linda Lee	1	14.02	14.02
2/11/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Status Report					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
70900	EXP	Olympia	1	14.02	14.02
2/24/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Notice of Non Appearance					
70956	EXP	Olympia	1	132.00	132.00
3/7/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
Case Anywhere					
71557	EXP	Olympia	1	34.62	34.62
4/22/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Stip to file MPA					
71594	EXP	Erika Mejia	1	14.02	14.02
4/27/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - NOE					
71751	EXP	Erika Mejia	1	75.82	75.82
5/10/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - MPA					
72120	EXP	Erika Mejia	1	14.02	14.02
6/9/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Notice of Withdrawal					
72246	EXP	Olympia	1	162.00	162.00
6/24/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
Case Anywhere					
72359	EXP	Erika Mejia	1	75.82	75.82
7/8/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - MPA					
72585	EXP	Erika Mejia	1	14.02	14.02
7/27/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Decl iso SLY					
72866	EXP	Erika Mejia	1	14.02	14.02
8/31/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Supp Decls					

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
73253	EXP	Olympia	1	186.00	186.00
10/10/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
Case Anywhere					
73846	EXP	Erika Mejia	1	15.02	15.02
12/5/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Amendment to Settlement Agreement					
73859	EXP	Olympia	1	120.00	120.00
12/9/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
Case Anywhere					
73892	EXP	Olympia	1	15.02	15.02
12/16/2022		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Notice of Minute Order					
74064	EXP	Erika Mejia	1	15.02	15.02
1/11/2023		Court fees			
WIP		Guevara, Joseph v. Global M			
ACE E Filing - Amended Proposed Order re MPA					
74622	EXP	Olympia	1	138.00	138.00
3/9/2023		Court fees			
WIP		Guevara, Joseph v. Global M			
Case Anywhere					
74707	EXP	Olympia	1	500.00	500.00
3/17/2023		Court fees			
WIP		Guevara, Joseph v. Global M			
Filing Fees					
Grand Total					
			0.00		11393.95
			0.00		0.00
			0.00		11393.95

EXHIBIT B

**Time and Task Summary
for Guevara v. Global Mail, Inc.
Larry W. Lee**

Description of Work	Hours
Review client documents and background information; confer with client re work place issues	6.2
Review and revise complaint and PAGA letters	3.1
Review and revise joint reports; meet and confer re same	2.4
Research and review prior wage/hour lawsuits against Defendant	3.8
Prepare draft of first set of discovery to Defendant	4.2
Review class data and documents produced by Defendant for mediation; review expert analysis re same; confer with all plaintiffs' counsel	8.3
Review and revise mediation brief; attend same; substantial follow up discussions re same with mediator and counsel for all parties	13.1
Review and revise settlement agreement; confer with counsel re changes to same; confer with client re same	8.6
Review and revise Motion for Preliminary Approval and supporting documents; prepare supplemental documents and briefs re same; confer with counsel and client re same	4.3
Confer with class members re settlement issues	3.9
Review and revise Motion for Final Approval and supporting documents	3.2
TOTAL	61.1