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THE NIELSEN COMPANY (US), LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

LARRY PEREZ on behalf of himself, all others
similarly situated, and on behalf of the general
public,

Plaintiffs,

v.

THE NIELSEN COMPANY (US), LLC; and
DOES 1-100,

Defendants.

Case No. 30-2021-01194324-CU-OE-CXC

**DECLARATION OF STEVEN
GUENTHER IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

**Complaint Filed: April 8, 2021
Trial Date: None Set**

DECLARATION OF STEVEN GUENTHER

I, Steven Guenther, declare and state as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to them under oath if called as a witness to do so.

2. I am currently employed as the Senior Software Developer for The Nielsen Company (US), LLC ("Nielsen"). I have held this role since 2013. In my role with Nielsen, I am familiar with employment and data for current and former employees for Nielsen. That data includes, among other things, the work location, the dates of employment of the employee, and weeks where the employee actively worked for Nielsen. That data is maintained in databases in the ordinary course of business by Nielsen. To the best of my knowledge, the statements below are accurate.

3. I understand that the Plaintiff and Nielsen have come to a settlement of the claims in this case, and are seeking approval of a Class Action Settlement Agreement ("Agreement"). I also understand that the Agreement currently defines a settlement class member as individuals employed as "non-exempt, salaried Membership Representative and/or Field Representative in California by Nielsen at sometime between April 8, 2017, through March 6, 2022."

4. I have reviewed Nielsen's employment records and data. Nielsen employed 318 individuals who meet the class definition set forth in the Agreement. Those individuals collectively worked 36,413 weeks between April 8, 2017, through March 6, 2022. Plaintiff Larry Perez worked 146 weeks during that same period.

5. Finally, I am unaware of any case asserting the same or similar claims as this current case on behalf of the class members identified in the Agreement, other than Case No. 30-2021-01194580-CU-OE-CXC, which is also brought by Plaintiff Larry Perez.

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

Executed on May __, 2022, in Tampa, Florida


