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THE NIELSEN COMPANY (US), LLC
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF ORANGE
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11 LARRY PEREZ on behalf of himself, all others
12 similarly situated, and on behalf of the general
public,

13 Plaintiffs,

14 v.

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

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

**DECLARATION OF TRACY STAINES IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

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

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DECLARATION OF TRACY STAINES

I, Tracy Staines, 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 Leader, People Experience Americas for The Nielsen Company (US), LLC ("Nielsen"). In my role with Nielsen, I am familiar with job requirements and expectations for Nielsen's employees. 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. Employees in the settlement class member definition above are expected to be fluent in English. Some employees are bi-lingual and use their language skills to help perform their job. However, communications with these employees by Nielsen are conducted in English.

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

Executed on May 3, 2022, in Clearwater, Florida


