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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN LUIS OBISPO

STEPHEN FIANT, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

ERNIE BALL, INC., a California
corporation; and DOES 1 through 100,

Defendants.

Case No. 21CV-0016

*[Assigned for all purposes to the Hon. Tana L.
Coates, Dept. 9]*

**DECLARATION OF SUSAN J. PEREZ
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: May 4, 2022

Time: 9:00 a.m.

Dept.: 9

Action Filed: January 14, 2021

Trial Date: None Set

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I, SUSAN J. PEREZ declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Stephen Fiant (“Plaintiff”) in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I received a Bachelor of Arts degree from UCSD in 2012, and a Juris Doctor from Loyola Law School, Los Angeles, in 2019. I was admitted to the California State Bar in December 2019. During law school, I externed for an administrative law judge at the Equal Employment Opportunity Commission in Los Angeles, California, where I assisted with drafting decisions on motions for summary judgment and attorneys' fees petitions. I also externed for a federal bankruptcy judge, where I drafted bench memoranda on substantive bankruptcy and civil procedure issues.

3. From December 2019 to May 2021, I was an associate attorney at B&D Law Group, APLC, a law firm dedicated to the practice of Plaintiff-side personal injury law located in Los Angeles, California. From June 2021 to December 2022, I was an associate attorney at Lucas and Barba, LLP, where I focused primarily on removal defense in U.S. immigration courts. Since January 2022, I have worked as an associate at Haines Law Group, APC.

4. Although non-exhaustive, the types of tasks I have performed include: conducting client intakes, drafting complaints, attending court hearings in state and federal administrative courts, corresponding with opposing counsel, drafting and responding to written discovery, taking and defending client testimony in U.S. removal proceedings, drafting and opposing a variety of motions including motions for summary judgment, drafting mediation briefs, attending mandatory settlement conferences, drafting long-form settlement agreements, and drafting motions for preliminary settlement approval.

5. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation since I joined Haines Law Group, APC in January 2022. The details of the work

1 completed by Plaintiff's Counsel in this case are set forth in the declaration of Matthew K.
2 Moen, filed concurrently herewith.

3 I declare under penalty of perjury under the laws of the United States and the state of
4 California that the foregoing is true and correct. Executed on April 7, 2022, at El Segundo,
5 California.

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