

Ronald J. Holland (SBN 148687)
ron.holland@gtlaw.com
Erik J. Christensen (SBN 314595)
erik.christensen@gtlaw.com
GREENBERG TRAURIG, LLP
101 Second Street, Suite 2200
San Francisco, California 94105
Telephone: (415) 655-1300
Facsimile: (415) 707-2010

Attorneys for Defendant
PROTERRA OPERATING COMPANY, INC.

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

MAHO LAZO, individually, and on behalf of all
others similarly situated,

Plaintiff,

v.

PROTERRA OPERATING COMPANY, INC., a
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 21STCV30663

CLASS ACTION

*[Assigned for all purposes to: Hon. Yvette M.
Palazuelos, Dept. 9]*

**DECLARATION OF ERIK J.
CHRISTENSEN IN SUPPORT OF THE
PARTIES' REQUEST FOR APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT AGREEMENT**

Complaint filed: August 19, 2021
Trial date: Not set

Hearing Date: October 5, 2023
Hearing Time: 10:00 a.m.
Hearing Place: Department 9

1. I am an attorney duly licensed to practice before all courts of the State of California and I am an associate at the law firm Greenberg Traurig, LLP, counsel of record for Defendant Proterra Operating Company, Inc. (“Proterra”). I have personal knowledge of the matters set forth herein based on review of all relevant communications and business records available to me as Proterra’s counsel, and if called upon, could and would competently testify thereto.

3. I am not aware of any other pending matters that will be extinguished or adversely affected by this Court's approval of the Parties' proposed settlement in the above-captioned matter beyond *Stephanie Bitetti v. Proterra Operating Company, Inc.*, Los Angeles County Superior Court Case No. 21STCV29732, and *Amar Khatib v. Proterra, Inc.*, San Mateo County Superior Court Case No. 22-CIV-01447 (together, the "Related Actions"). The plaintiffs, claims, putative/PAGA classes, and class/PAGA periods in the Related Actions are eclipsed entirely by those in the above-captioned matter. In fact, the Plaintiffs and their counsel in this case are the very same as in the Related Actions. Plaintiffs have therefore agreed to release all of their claims against Proterra through the present Settlement Agreement, which will result in dismissal of the Related Actions. (*See Settlement Agreement, § E.*)

Executed this 24th day of May 2023, at Reno, Nevada.

Erik J. Christensen