

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Andrew J. Rowbotham (SBN 301367)
arowbotham@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355
Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ELIA PAREDES ACOSTA, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

SMG/LONG BEACH CONVENTION AND
ENTERTAINMENT CENTER, a business
entity form unknown; ASM GLOBAL
FRESNO, LLC, a Delaware limited liability
company; and DOES 1 through 100,

Defendants.

CASE NO. 21STCV27103

*[Assigned for all purposes to the Hon. Stuart
M. Rice]*

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

Date: April 23, 2025

Time: 10:30 a.m.

Dept.: SSC-1

Action Filed: July 23, 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
Elia Paredes Acosta (“Plaintiff”) in the above-captioned matter. I am a member in good
of the bar of the State of California and am admitted to practice in this Court. I have
knowledge of the facts stated in this declaration and could testify competently to them
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 November 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 legal decisions on motions for summary judgment and attorneys' fees petitions. I also worked 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 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 Barba and Barba, LLP, where I focused primarily on removal defense in U.S. immigration law. Since January 2023, I have worked as an associate at Haines Law Group, APC.

4. Although non-exhaustive, the types of tasks I have performed include: taking 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 arguing a variety of motions including motions for summary judgment, drafting mediation agreements, attending mandatory settlement conferences, drafting long-form settlement agreements, and drafting motions for preliminary and final settlement approval.

5. The following is a non-exhaustive list of the class action settlements in which I have been named as Class Counsel, and which have been granted final approval: *Stephen Fiant*

1 *v. Ernie Ball, Inc.*, San Luis Obispo County Superior Court, Case No. 21CV-0016; *Erving v.*
2 *Lazer Spot, Inc.*, San Bernardino County Superior Court, Case No. CIVSB2101370; *Santiago*
3 *Gutierrez v. M.M.C.L., Inc.*, Orange County Superior Court, Case No. 30-2021-01182371
4 (approving an hourly rate of \$475 for work performed in 2022-2023); *Robert Lewis v. IMERYS*
5 *Filtration Minerals, Inc., et al.*, Santa Barbara County Superior Court, Case No. 22CV02874
6 (approving an hourly rate of \$475 for work performed in 2022-2023); *Gerardo Sanchez v.*
7 *Dutton Home Services, LLC*, Los Angeles County Superior Court, Case No. 22STCV01834
8 (approving an hourly rate of \$475 for work performed in 2022-2023); *Aaron Hallum, et al. v.*
9 *FCA US, LLC*, Case No. CIVDS1936782, San Bernardino County Superior Court, Honorable
10 Joseph T. Ortiz, presiding (approving an hourly rate of \$475 for work performed in 2022-2024);
11 and *Rafael Perez, et al. v. Kyocera SGS Precision Tools, Inc.*, Case No. 30-2022-01299232-CU-
12 OE-CXC, Orange County Superior Court, Honorable Randall J. Sherman, presiding (approving
13 an hourly rate of \$475 for work performed in 2022-2024).

14 6. I have also been approved at the following rates: *Santos Orellana v. Smarte*
15 *Carte, Inc.*, Case No. 20STCV08890, Los Angeles County Superior Court, Honorable Yvette M.
16 Palazuelos, presiding (approving an hourly rate of \$350 for work performed in 2022); *Ketema*
17 *Nelson v. Santini Foods, Inc.*, Case No. RG21090890, Alameda County Superior Court,
18 Honorable Evelio Grillo, presiding (approving an hourly rate of \$375 for work performed in
19 2022); *Edward Salgado v. S.R. Bray LLC, dba Power Plus!, et al.*, Case No. 30-2020-
20 01172134-CU-OE-CXC, Orange County Superior Court, Honorable Lon F. Hurwitz, presiding
21 (approving an hourly rate of \$475 for work performed in 2022-2023); *Antonio Manuel Vasquez,*
22 *et al. v. Delta Framing, Inc.*, Case No. 30-2016-00893517-CU-OE-CXC, Orange County
23 Superior Court, Honorable Peter Wilson, presiding (approving an hourly rate of \$475 for work
24 performed in 2022-2023); *Roberto Arcos, et al. v. Panoramic Doors, LLC*, Case No. 37-2021-
25 00048823-CU-OE-CTL, San Diego County Superior Court, Honorable Loren G. Freestone,
26 presiding (approving an hourly rate of \$475 for work performed in 2022-2023); and *Olivia Rose*
27 *Ramirez, et al. v. Wyndham Vacation Ownership, Inc.*, Case No. 20CV01715, Santa Barbara
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1 County Superior Court, Honorable James F. Rigali, presiding (approving an hourly rate of \$475
2 for work performed in 2022-2024).

3 7. As counsel for Plaintiff, I have been closely involved in all aspects of this
4 litigation since its inception. The details of the work completed by Class Counsel in this case
5 are set forth in the declaration of Andrew J. Rowbotham, filed concurrently herewith.

6 8. I confirm that I do not have any interest or involvement in, and am not affiliated
7 with, the proposed settlement administrator, Apex Class Action Administration. Likewise I have
8 no interest with the proposed *cy pres* recipient, Legal Aid Foundation of Los Angeles.

9 I declare under penalty of perjury under the laws of the United States and the state of
10 California that the foregoing is true and correct. Executed on February 4, 2025, at El Segundo,
11 California.

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Susan J. Perez