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8 FELIS A. PEREZ, and all others similarly situated
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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SANTA CLARA**
12 **(UNLIMITED JURISDICTION)**

13 FELIS A. PEREZ, on behalf of himself, all others
14 similarly situated, the general public, and as an
15 “aggrieved employee” on behalf of other
“aggrieved employees” under the Labor Code
Private Attorneys General Act of 2004,

16 *Plaintiff(s),*

17
18 vs.

19 NXEDGE MH LLC, a Delaware limited liability
company; NXEDGE SAN CARLOS, LLC, a
20 Delaware limited liability company; NXEDGE
CSL, LLC, a Nevada limited liability company;
21 and DOES 3–50, inclusive,

22 *Defendant(s).*
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Case No. 21CV387173

**SUPPLEMENTAL DECLARATION
OF WALTER HAINES IN SUPPORT
OF PLAINTIFF FELIS A. PEREZ’S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Date: April 5, 2023

Hearing Time: 1:30 p.m.

Hearing Dept.: 19, The Honorable
Theodore C. Zayner

Action filed: September 29, 2021



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ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)

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DECLARATION OF WALTER HAINES

I, WALTER HAINES, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for Plaintiff Felis A. Perez (“Plaintiff” or “Perez”) in his Action against Defendants NxEdge MH LLC, NxEdge San Carlos, LLC, NxEdge CSL, LLC (“Defendants” or “NxEdge”). I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement. I make this Declaration based on my personal knowledge and if called to testify I could and would competently testify to the matters contained in this Declaration.

2. I have no conflicts of interest with the class or with the Class Representative. I am not related to any representative Plaintiff. I have not previously represented Defendants in any matter. I do not represent opposing factions within the class in that all claims are predicated upon the same theories of liability and benefit all class members equally. My law firm and I have no relationship with Legal Aid at Work, the proposed cy pres recipient in accordance with Code of Civil Procedure § 384(b). In sum, I am well-suited to act as Class Counsel and will continue to vigorously represent the interests of the class.

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

Executed on March 17, 2023 at Los Angeles, California.



WALTER HAINES,
Declarant



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