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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

AARON HALLUM and AMY RAMOS, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

FCA US, LLC, doing business as FIAT
CHRYSLER AUTOMOBILES, a Delaware
Corporation; and DOES 1-50, inclusive,
Defendants.

CASE NO. CIVDS1936782

*[Case assigned for all purposes to the Hon.
Joseph T. Ortiz, Dept. S17]*

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

Date: January 22, 2024
Time: 1:30 p.m.
Dept.: S17

Action Filed: December 5, 2019
Trial Date: None Set

DECLARATION OF SUSAN J. PEREZ

I, Susan J. Perez declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiffs Aaron Hallum and Amy Ramos (“Plaintiffs”) 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 2021, 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 and final settlement approval.

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1 5. The following is a non-exhaustive list of the class action settlements in which I
2 have been named as Class Counsel, and which have been granted final approval: *Stephen Fiant*
3 *v. Ernie Ball, Inc.*, San Luis Obispo County Superior Court, Case No. 21CV-0016; *Erving v.*
4 *Lazer Spot, Inc.*, San Bernardino County Superior Court, Case No. CIVSB2101370; *Santiago*
5 *Gutierrez v. M.M.C.L., Inc.*, Orange County Superior Court, Case No. 30-2021-01182371
6 (approving an hourly rate of \$475 for work performed in 2022-2023); *Robert Lewis v. IMERY'S*
7 *Filtration Minerals, Inc., et al.*, Santa Barbara County Superior Court, Case No. 22CV02874
8 (approving an hourly rate of \$475 for work performed in 2022-2023); and *Gerardo Sanchez v.*
9 *Dutton Home Services, LLC*, Los Angeles County Superior Court, Case No. 22STCV01834
10 (approving an hourly rate of \$475 for work performed in 2022-2023).

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

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

I declare under penalty of perjury under the laws of the United States and the state of California that the foregoing is true and correct. Executed on December 27, 2023, at El Segundo, California.

Sus J. Peng

Susan J. Perez