

HAINES LAW GROUP, APC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA BARBARA

ROBERT LEWIS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

IMERYS FILTRATION MINERALS, INC., a
Delaware corporation; IMERYS
PERFORMANCE MINERALS AMERICAS,
INC., a Delaware corporation; and DOES 1
through 100,

Defendants.

Case No.: 22CV04874

*[Assigned for all purposes to the Hon. Jed
Beebe; Dept. 4]*

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

Date: April 20, 2023
Time: 8:30 a.m.
Dept.: 4

Action Filed: December 8, 2022
Trial Date: None Set

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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 v. Ernie Ball, Inc.*, San Luis Obispo County Superior Court, Case No. 21CV-0016; *Erving v. Lazer Spot, Inc.*, San Bernardino County Superior Court, Case No. CIVSB2101370.

6. I have also been preliminarily appointed as Class Counsel in the following class action settlements pending final approval: *Santiago Gutierrez v. M.M.C.L., Inc.*, Orange County Superior Court, Case No. 30-2021-01182371.

7. I have also been approved at the following rates: *Santos Orellana v. Smarte Carte, Inc.*, Case No. 20STCV08890, Los Angeles County Superior Court, Honorable Yvette M. Palazuelos, presiding (approving an hourly rate of \$350 for work performed in 2022); *Ketema Nelson v. Santini Foods, Inc.*, Case No. RG21090890, Alameda County Superior Court, Honorable Evelio Grillo, presiding (approving an hourly rate of \$375 for work performed in 2022); and *Edward Salgado v. S.R. Bray LLC, dba Power Plus!, et al.*, Case No. 30-2020-01172134-CU-OE-CXC, Orange County Superior Court, Honorable Lon F. Hurwitz, presiding (approving an hourly rate of \$475 for work performed in 2022-2023).

8. 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 completed by Plaintiff's 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 March 24, 2023, at El Segundo, California.


Susan J. Perez