

HAINES LAW GROUP, APC

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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

GERARDO SANCHEZ, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

DUTTON HOME SERVICES, LLC, a
California corporation; and DOES 1
through 100,

Defendants.

CASE NO. 22STCV01834

*[Case assigned for all purposes to the Hon.
Maren E. Nelson, Dept. 17]*

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

Date: May 22, 2023
Time: 9:00 a.m.
Dept.: 17

Action Filed: January 14, 2022
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 Plaintiff Gerardo Sanchez (“Plaintiff”) 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 2022, 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 settlement approval.

5. The following is a non-exhaustive list of the class action settlements in which I have been preliminarily appointed as Class Counsel: *Stephen Fiant v. Ernie Ball, Inc.*, San Luis Obispo County Superior Court, Case No. 21CV-0016.

6. 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 Class Counsel in this case are set forth in the declaration of Fletcher W. Schmidt, filed concurrently herewith.

7. I confirm that I am not affiliated with the proposed settlement administrator, CPT Group, Inc.

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 January 25, 2023, at El Segundo, California.


Susan J. Perez