

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
Susan J. Perez (SBN 329044)
sperez@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**

JUAN DAVID ARREOLA CARRILLO, as
an individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

KPS GLOBAL, LLC, a Delaware
corporation; and DOES 1 through 100,

Defendants.

CASE NO. 22STCV19527

*[Case assigned for all purposes to the Hon.
Kenneth R. Freeman, Dept. 14]*

**DECLARATION OF SUSAN J. PEREZ IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND CLASS
REPRESENTATIVE ENHANCEMENT
AWARD**

Date: March 11, 2025
Time: 11:00 a.m.
Dept.: 14

Action Filed: June 15, 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
 of Juan David Arreola Carrillo (“Plaintiff”) in the above-captioned matter. I am a member
 standing of the bar of the State of California and am admitted to practice in this Court. I
 personal knowledge of the facts stated in this declaration and could testify competently to
 called upon to do so.

2. I received a Bachelor of Arts degree from UCSD in 2012, and a Juris Doctor from 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 appeals 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 APLC, a law firm dedicated to the practice of Plaintiff-side personal injury law located in geles, California. From June 2021 to December 2022, I was an associate attorney at Lucas rba, LLP, where I focused primarily on removal defense in U.S. immigration courts. Since y 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 intake, drafting complaints, attending court hearings in state and federal administrative proceedings, 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 memoranda 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 v.*

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

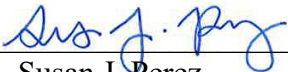
14 6. I have also been approved at the following rates: *Santos Orellana v. Smarte Carte,*
15 *Inc.*, Case No. 20STCV08890, Los Angeles County Superior Court, Honorable Yvette M.
16 Palazuelos, presiding (approving an hourly rate of \$350 for work performed in 2022); *Ketema*
17 *Nelson v. Santini Foods,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

3 7. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation
4 since its inception. The details of the work completed by Class Counsel in this case are set forth
5 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, CPT Group, Inc.

8 I declare under penalty of perjury under the laws of the United States and the state of
9 California that the foregoing is true and correct. Executed on February 7, 2025, at El Segundo,
10 California.

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12 Susan J. Perez