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**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 PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: February 1, 2024
Time: 10:00 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 Plaintiff Juan David Arreola Carrillo (“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 and final settlement approval.

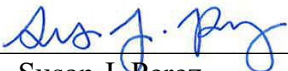
5. The following is a non-exhaustive list of the class action settlements in which I have been named as Class Counsel, and which have been granted final approval: *Stephen Fiant v.*

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; and *Robert Lewis*
4 *v. IMERYS Filtration Minerals, Inc., et al.*, Santa Barbara County Superior Court, Case No.
5 22CV02874.

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

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

11 I declare under penalty of perjury under the laws of the United States and the state of
12 California that the foregoing is true and correct. Executed on January 2, 2024, at El Segundo,
13 California.

14 
15 Susan J. Perez