

HAINES LAW GROUP, APC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SONOMA

CAMERON SMITH, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

REGAL III, LLC, a California Limited
Liability Company, JACKSON FAMILY
ENTERPRISES, INC., a Delaware
Corporation; and DOES 1 through 100,

Defendants.

Case No.: 25CV02184

*[Assigned for all purposes to the Hon. Dana
Beernink Simonds; Courtroom 18]*

**DECLARATION OF SUSAN J. PEREZ IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA
SETTLEMENT, ATTORNEYS' FEES
AND COSTS, REPRESENTATIVE
ENHANCEMENT PAYMENT, AND
SETTLEMENT ADMINISTRATION
COSTS**

Action Filed: March 26, 2025
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 Cameron Smith (“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 (awarding
4 attorney's fees following a lodestar cross-check based on an hourly rate of \$475 for work
5 performed in 2022-2023); *Robert Lewis v. IMERYS Filtration Minerals, Inc., et al.*, Santa Barbara
6 County Superior Court, Case No. 22CV02874 (awarding attorney's fees following a lodestar
7 cross-check based on an hourly rate of \$475 for work performed in 2022-2023); *Gerardo Sanchez*
8 *v. Dutton Home Services, LLC*, Los Angeles County Superior Court, Case No. 22STCV01834
9 (awarding attorney's fees following a lodestar cross-check based on an hourly rate of \$475 for
10 work performed in 2022-2023); *Aaron Hallum, et al. v. FCA US, LLC*, Case No. CIVDS1936782,
11 San Bernardino County Superior Court, Honorable Joseph T. Ortiz, presiding (awarding
12 attorney's fees following a lodestar cross-check based on an hourly rate of \$475 for work
13 performed in 2022-2024); *Rafael Perez, et al. v. Kyocera SGS Precision Tools, Inc.*, Case No. 30-
14 2022-01299232-CU-OE-CXC, Orange County Superior Court, Honorable Randall J. Sherman,
15 presiding (awarding attorney's fees following a lodestar cross-check based on an hourly rate of
16 \$475 for work performed in 2022-2024); *Juan David Arreola Carrillo v. KPS Global, LLC*, Case
17 No. 22STCV19527, Los Angeles County Superior Court, Honorable Samantha Jessner, presiding
18 (awarding attorney's fees following a lodestar cross-check based on an hourly rate of \$550 for
19 work performed in 2022-2025); *In Re: Stanislaus Food Products Company Employment Cases*,
20 Lead Case No. CV-23-001433, Stanislaus County Superior Court, Honorable John D. Freeland,
21 presiding (using an hourly rate of \$550 for work performed in 2023-2025); *Elia Paredes Acosta*
22 *vs. Defendant SMG/Long Beach Convention and Entertainment Center*, Case No. 21STCV27103,
23 Los Angeles County Superior Court, Honorable Theresa M. Traber, presiding (awarding
24 attorney's fees following a lodestar cross-check based on an hourly rate of \$550 for work
25 performed in 2022-2025); and *Ada Mendoza v. Desert Valley Date LLC*, Case No. CVRI2301048,
26 Riverside County Superior Court, Honorable Harold W. Hopp presiding (awarding attorney's fees
27 following a lodestar cross-check based on an hourly rate of \$550 for work performed in 2023-
28 2026).

6. 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 Andrew J. Rowbotham, filed concurrently herewith.

7. I confirm that I do not have any interest or involvement in, and am not affiliated with, the proposed settlement administrator, Phoenix Settlement Administrators.

8. I am not aware of any other pending class, representative, or collective action that would release the same PAGA civil penalty claims for the same Aggrieved Employees during the same PAGA Period.

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 June 29, 2026, at El Segundo, California.

Sus J. Peng

Susan J. Perez