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ENVIRONMENTAL SYSTEMS
10 RESEARCH INSTITUTE, INC.

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF SAN BERNARDINO

14 YESENIA GUTIERREZ and KATHY CHAN,
15 individually and on behalf of all others
similarly situated,

16 Plaintiffs,

17 v.

18 ENVIRONMENTAL SYSTEMS RESEARCH
19 INSTITUTE, INC., a California Corporation,

20 Defendant.

Case No. CIVSB2300014

(Assigned for All Purposes to the Hon.
Christian Towns, Dept. S26)

**DECLARATION OF CHRIS NOWLIN IN
SUPPORT OF PLAINTIFFS YESENIA
GUTIERREZ'S AND KATHY CHAN'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
SETTLEMENT**

21 Date Action Filed: January 4, 2023
22 Trial Date: Not Yet Set

DECLARATION OF CHRIS NOWLIN

I, Chris Nowlin, declare:

1. I am the Chief Human Resources Officer at Environmental Systems Research Institute, Inc. (Esri), a defendant in this action. I submit this Declaration in support of Plaintiffs Yesenia Gutierrez's and Kathy Chan's Motion for Preliminary Approval of Class and PAGA Settlement. I have personal knowledge of the facts set forth in this Declaration, and if called as a witness, could and would testify as to their accuracy.

2. The proposed *cy pres* recipient for the settlement in this matter is Child Advocates of San Bernardino County (C.A.S.A.).

3. I am not aware of any relationship between Child Advocates of San Bernardino County (C.A.S.A.) and Esri or anyone at Esri that might create a conflict or the appearance of impropriety regarding Esri's agreement to designate Child Advocates of San Bernardino County (C.A.S.A.) as the *cy pres* recipient in this action.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 5/12/2025 in Redlands, California.

Signed by:

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Chris Nowlin