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8 Attorneys for Defendant NEXEN TIRE AMERICA, INC.

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF SAN BERNARDINO**

11 DAVID ALEGRIA, Individually, and on
12 behalf of other members of the general public
13 similarly situated,

14 Plaintiff,

15 vs.

16 NEXEN TIRE AMERICA, INC., a California
17 Corporation; and DOES 1-10, inclusive,

18 Defendants.

Case No. CIVSB2304566

19 **DECLARATION OF LISA YANG**
20 **(DEFENSE COUNSEL) IN SUPPORT OF**
21 **MOTION FOR PRELIMINARY**
22 **APPROVAL OF SETTLEMENT, AND**
23 **CERTIFICATION OF PROVISIONAL**
24 **SETTLEMENT CLASS**

25 [Assigned to Hon. Jessica Morgan
26 Department S-26]

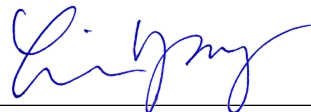
DECLARATION OF LISA J. YANG

I, Lisa J. Yang, declare and state as follows:

1. I am an attorney admitted to practice before this court and am counsel of record for Defendant Nexen Tire America, Inc. ("Nexen") in this matter. I have personal knowledge of the facts set forth herein and could testify competently thereto. I make this declaration to support Plaintiffs' Motion for Preliminary Approval of Settlement and Certification of Provisional Settlement Class, which is unopposed by Nexen.

2. I have conducted a search through both PACER for federal court and through the public records portal available on Westlaw to determine whether there is pending any matter throughout the state and federal courts in California which are either related to or potentially influenced by this settlement. Specifically, other than this pending matter, there is one other action in the San Bernardino Superior Court which involves Nexen, but that case deals with a breach of contract issue and is substantively unrelated to any issues in this case. In addition, there is one arbitration matter pending with the American Arbitration Association (AAA) which also deals with breach of contract issues and is substantively unrelated to any issues in this case. I have confirmed the same with the Company's CFO as well.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. This declaration is executed on April 9, 2026 in Los Angeles, California.



Lisa J. Yang

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 707 Wilshire Boulevard, 46th Floor, Los Angeles, California 90017.

On April 9, 2026, I served the foregoing document described as:

DECLARATION OF LISA YANG (DEFENSE COUNSEL) IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT, AND CERTIFICATION OF PROVISIONAL SETTLEMENT CLASS

on the interested parties in this action as follows:

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[✓] BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address rebecca.zamora@limnexus.com to the persons at the e-mail address(es) listed above. I did not receive within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: April 9, 2026

Rebecca Zamora

Rebecca Zamora