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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ESTHER PRICE, as an individual and on behalf of all others similarly situated,

Plaintiff,

vs.

HITACHI HIGH-TECH AMERICA, INC., a Delaware corporation; HITACHI HIGH-TECH SCIENCE AMERICA, INC., a California corporation; and DOES 1 through 100,

Defendants.

Case No. 25STCV28131

[Assigned for all purposes to Hon. Samantha P. Jessner, Dept. SS-7]

DECLARATION OF KRISTOPHER N. TAYYEB IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Date: February 24, 2027
Time: 10:00 a.m.
Dept.: SS-7

Complaint Filed: September 23, 2025
Trial Date: None Set

I, KRISTOPHER N. TAYYEB, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Esther Price ("Plaintiff") and the proposed Settlement Class 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 the University of California, Davis in 2012, and a Juris Doctor from the University of California, Los Angeles School of Law in 2015. I was admitted to the California State Bar in February 2018.

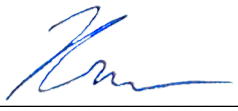
3. After graduating from law school, I worked as an associate for The Cowan Law Firm from February 2018 until approximately December 2021, primarily practicing plaintiff-side employment law. From January 2022 through July 2025, I worked as an associate at the plaintiff's-side litigation firm, The Berenji Law Firm, representing employees in class wage-and-hour actions, PAGA actions, and individual wrongful termination actions against employers. Although non-exhaustive, the types of work I performed at these firms included: conducting client intakes; performing pre-filing research and analysis; drafting complaints; attending court hearings; corresponding with opposing counsel; drafting and responding to written discovery; preparing for and taking and defending depositions; analyzing payroll and timekeeping records and employee handbooks; drafting and opposing a variety of motions including motions for summary judgment, demurrers and motions to dismiss, motions to compel, and motions for certification; drafting mediation briefs and attending mediations; drafting motions for preliminary and final settlement approval; and second- and third-chairing jury trials.

4. Since August 2025, I have worked as an associate at my current firm, Haines Law Group, APC. I am currently staffed on approximately thirty (30) active wage and hour class actions in which I play a significant role.

5. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation, including such tasks as: corresponding with opposing counsel; analyzing timekeeping and payroll records and employee handbooks; drafting the mediation brief and attending mediation; drafting the long-form settlement agreement; and drafting the motion for preliminary

approval. The details of the work completed by Class Counsel in this case are set forth in the declaration of Sean M. Blakely, filed concurrently herewith.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 7, 2026, at El Segundo, California.



Kristopher N. Tayyeb