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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF KERN

ALEJANDRO ORTEGA, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

KEY ENERGY SERVICES, LLC, a Texas
limited liability company; and DOES 1
through 100,

Defendants.

Case No.: BCV-23-102240-BCB

*[Assigned for all purposes to the Hon. Bernard
C. Barmann, Jr., Bakersfield Division H]*

**DECLARATION OF SUSAN J. PEREZ IN
SUPPORT OF PLAINTIFF'S MOTION
FOR SETTLEMENT APPROVAL OF
CLAIMS BROUGHT UNDER THE
PRIVATE ATTORNEYS GENERAL ACT,
REASONABLE ATTORNEYS' FEES AND
COSTS, AND REPRESENTATIVE
ENHANCEMENT PAYMENT**

Date: December 13, 2024

Time: 8:30 a.m.

Dept: Bakersfield Division H

Action Filed: July 12, 2023

Trial Date: None Set

DECLARATION OF SUSAN J. PEREZ

I, Susan J. Perez declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Alejandro Ortega (“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.

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1 5. The following is a non-exhaustive list of the class action settlements in which I
2 have been named as Class Counsel, and which have been granted final approval: *Stephen Fiant*
3 *v. Ernie Ball, Inc.*, San Luis Obispo County Superior Court, Case No. 21CV-0016; *Erving v.*
4 *Lazer Spot, Inc.*, San Bernardino County Superior Court, Case No. CIVSB2101370; *Santiago*
5 *Gutierrez v. M.M.C.L., Inc.*, Orange County Superior Court, Case No. 30-2021-01182371
6 (awarding attorney's fees following a lodestar cross-check based on an hourly rate of \$475 for
7 work performed in 2022-2023); *Robert Lewis v. IMERYS Filtration Minerals, Inc., et al.*, Santa
8 Barbara County Superior Court, Case No. 22CV02874 (awarding attorney's fees following a
9 lodestar cross-check based on an hourly rate of \$475 for work performed in 2022-2023);
10 *Gerardo Sanchez v. Dutton Home Services, LLC*, Los Angeles County Superior Court, Case No.
11 22STCV01834 (awarding attorney's fees following a lodestar cross-check based on an hourly
12 rate of \$475 for work performed in 2022-2023); *Aaron Hallum, et al. v. FCA US, LLC*, Case No.
13 CIVDS1936782, San Bernardino County Superior Court, Honorable Joseph T. Ortiz, presiding
14 (awarding attorney's fees following a lodestar cross-check based on an hourly rate of \$475 for
15 work performed in 2022-2024); and *Rafael Perez v. Kyocera SGS Precision Tools, Inc.*, Case
16 No. 30-2022-01299232-CU-OE-CXC, Orange County Superior Court, Honorable Randall J.
17 Sherman, presiding (awarding attorney's fees following a lodestar cross-check based on an
18 hourly rate of \$475 for work performed in 2022-2024).

19 6. I have also been approved at the following rates: *Santos Orellana v. Smarte*
20 *Carte, Inc.*, Case No. 20STCV08890, Los Angeles County Superior Court, Honorable Yvette M.
21 Palazuelos, presiding (approving an hourly rate of \$350 for work performed in 2022); *Ketema*
22 *Nelson v. Santini Foods, Inc.*, Case No. RG21090890, Alameda County Superior Court,
23 Honorable Evelio Grillo, presiding (approving an hourly rate of \$375 for work performed in
24 2022); *Edward Salgado v. S.R. Bray LLC, dba Power Plus!, et al.*, Case No. 30-2020-
25 01172134-CU-OE-CXC, Orange County Superior Court, Honorable Lon F. Hurwitz, presiding
26 (approving an hourly rate of \$475 for work performed in 2022-2023); *Antonio Manuel Vasquez,*
27 *et al. v. Delta Framing, Inc.*, Case No. 30-2016-00893517-CU-OE-CXC, Orange County
28 Superior Court, Honorable Peter Wilson, presiding (approving an hourly rate of \$475 for work

1 performed in 2022-2023); *Roberto Arcos, et al. v. Panoramic Doors, LLC*, Case No. 37-2021-
2 00048823-CU-OE-CTL, San Diego County Superior Court, Honorable Loren G. Freestone,
3 presiding (approving an hourly rate of \$475 for work performed in 2022-2023); and *Olivia Rose*
4 *Ramirez, et al. v. Wyndham Vacation Ownership, Inc.*, Case No. 20CV01715, Santa Barbara
5 County Superior Court, Honorable James F. Rigali, presiding (approving an hourly rate of \$475
6 for work performed in 2022-2024).

7 7. As counsel for Plaintiff, I have been closely involved in all aspects of this
8 litigation since its inception. The details of the work completed by Plaintiff's Counsel in this
9 case are set forth in the declaration of Matthew K. Moen, filed concurrently herewith.

10 8. I confirm that I do not have any interest or involvement in, and am not affiliated
11 with, the proposed settlement administrator, Phoenix Class Action Administration Solutions, or
12 the proposed *cy pres* recipient, Court Appointed Special Advocates (CASA) of Kern County.

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14 I declare under penalty of perjury under the laws of the United States and the state of
15 California that the foregoing is true and correct. Executed on November 15, 2024, at El
16 Segundo, California.

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18 Susan J. Perez