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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

RUBEN PEREZ, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

GRAIN CRAFT, LLC, a Delaware limited
liability company; and DOES 1 through 100,

Defendants.

Case No.: 23STCV24438

*[Case assigned for all purposes to the Hon.
William F. Highberger, Dept. SSC-10]*

**DECLARATION OF JOEL M.
GORDON IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: July 2, 2025
Time: 10:00 a.m.
Dept.: SSC-10

Complaint Filed: October 6, 2023
Trial Date: None Set

1 I, JOEL M. GORDON, declare as follows:

2 1. I am an associate with Haines Law Group, APC, and counsel for the named
3 Plaintiff Ruben Perez (“Plaintiff”) in the above-captioned matter. I am a member in good standing
4 of the bar of the State of California and am admitted to practice in this Court. I have personal
5 knowledge of the facts stated in this declaration and could testify competently to them if called
6 upon to do so.

7 2. I received a Bachelor of Arts degree from Washington University in St. Louis in
8 1997, and a Juris Doctor from the University Southern California in 2011. I was admitted to the
9 California State Bar in November 2011. During law school, I externed for the Honorable Gregory
10 W. Alarcon in the Los Angeles Superior Court and for the Federal Trade Commission in Los
11 Angeles, where I assisted in the prosecution of civil fraud actions on behalf of consumers.

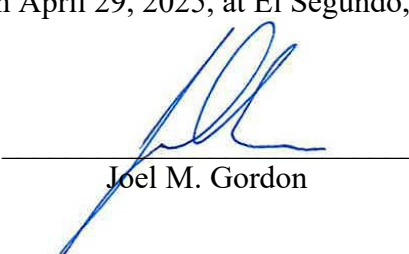
12 3. After graduating from law school, I worked for Kiesel Law, LLP, a plaintiff-side
13 personal injury, mass tort, and consumer class action firm, from April 2013 until April 2016.
14 From April 2016 until February 2020, I worked as an associate at the plaintiff’s-side litigation
15 firm, Cotchett Pitre & McCarthy LLP, representing plaintiffs in product liability, consumer and
16 healthcare fraud, mass tort, and personal injury cases. From February 2020 until July 2023, I
17 worked as an associate at the plaintiff’s-side employment firm, Marlin & Saltzman LLP,
18 representing employees in class wage-and-hour actions and PAGA actions against employers.
19 Although non-exhaustive, the types of work I performed at these firms included: conducting client
20 intakes; performing pre-filing research and analysis; drafting complaints; attending court
21 hearings; corresponding with opposing counsel; drafting and responding to written discovery;
22 preparing for and taking and defending depositions; analyzing payroll and timekeeping records
23 and employee handbooks; drafting and opposing a variety of motions including motions for
24 summary judgment, motions for remand, demurrers and motions to dismiss, motions to compel,
25 and motions for certification; drafting mediation briefs and attending mediations; drafting long-
26 form settlement agreements; and drafting motions for preliminary and final settlement approval.

27 4. Since July 2023, I have worked as an associate at my current firm, Haines Law
28 Group, APC. I am currently staffed on approximately forty (40) active wage and hour class actions

1 in which I play a significant role.

2 5. As counsel for Plaintiff, I have been closely involved in all aspects of this
3 litigation, including such tasks as: corresponding with opposing counsel; analyzing payroll and
4 timekeeping records and employee handbooks; drafting the mediation brief and attending
5 mediation; drafting the long-form settlement agreement; and drafting the motion for preliminary
6 approval. The details of the work completed by Class Counsel in this case are set forth in the
7 declaration of Sean M. Blakely, filed concurrently herewith.

8 I declare under penalty of perjury under the laws of California and the United States that
9 the foregoing is true and correct. Executed on April 29, 2025, at El Segundo, California.

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Joel M. Gordon