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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

ELIDA CORONA, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

WEST AMERICAN RUBBER
COMPANY, LLC, a California Limited
Liability Company; and DOES 1 through
100,

Defendants.

Case No. 30-2024-01383622-CU-OE-CXC

*[Case assigned for all purposes to the Hon.
Melissa R. McCormick, Dept. CX105]*

**DECLARATION OF SUSAN J. PEREZ IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENT**

Date: May 28, 2026
Time: 2:00 p.m.
Dept.: CX105

Action Filed: March 4, 2024
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 Elida Corona (“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.

5. The following is a non-exhaustive list of the class action settlements in which I have been named as Class Counsel, and which have been granted final approval: *Stephen Fiant v.*

1 *Ernie Ball, Inc.*, San Luis Obispo County Superior Court, Case No. 21CV-0016; *Erving v. Lazer*
2 *Spot, Inc.*, San Bernardino County Superior Court, Case No. CIVSB2101370; *Santiago Gutierrez*
3 *v. M.M.C.L., Inc.*, Orange County Superior Court, Case No. 30-2021-01182371 (awarding
4 attorney's fees following a lodestar cross-check based on an hourly rate of \$475 for work
5 performed in 2022-2023); *Robert Lewis v. IMERYS Filtration Minerals, Inc., et al.*, Santa Barbara
6 County Superior Court, Case No. 22CV02874 (awarding attorney's fees following a lodestar
7 cross-check based on an hourly rate of \$475 for work performed in 2022-2023); *Gerardo Sanchez*
8 *v. Dutton Home Services, LLC*, Los Angeles County Superior Court, Case No. 22STCV01834
9 (awarding attorney's fees following a lodestar cross-check based on an hourly rate of \$475 for
10 work performed in 2022-2023); *Aaron Hallum, et al. v. FCA US, LLC*, Case No. CIVDS1936782,
11 San Bernardino County Superior Court, Honorable Joseph T. Ortiz, presiding (awarding
12 attorney's fees following a lodestar cross-check based on an hourly rate of \$475 for work
13 performed in 2022-2024); *Rafael Perez, et al. v. Kyocera SGS Precision Tools, Inc.*, Case No. 30-
14 2022-01299232-CU-OE-CXC, Orange County Superior Court, Honorable Randall J. Sherman,
15 presiding (awarding attorney's fees following a lodestar cross-check based on an hourly rate of
16 \$475 for work performed in 2022-2024); *Juan David Arreola Carrillo v. KPS Global, LLC*, Case
17 No. 22STCV19527, Los Angeles County Superior Court, Honorable Samantha Jessner, presiding
18 (awarding attorney's fees following a lodestar cross-check based on an hourly rate of \$550 for
19 work performed in 2022-2025); *In Re: Stanislaus Food Products Company Employment Cases*,
20 Lead Case No. CV-23-001433, Stanislaus County Superior Court, Honorable John D. Freeland,
21 presiding (using an hourly rate of \$550 for work performed in 2023-2025); *Elia Paredes Acosta*
22 *vs. Defendant SMG/Long Beach Convention and Entertainment Center*, Case No. 21STCV27103,
23 Los Angeles County Superior Court, Honorable Theresa M. Traber, presiding (awarding
24 attorney's fees following a lodestar cross-check based on an hourly rate of \$550 for work
25 performed in 2022-2025); *Alfonso Almaraz v. World Oil Corp.*, Case No. 23STCV18296, Los
26 Angeles County Superior Court, Honorable David S. Cunningham III, presiding (using an hourly
27 rate of \$550 for work performed in 2023-2026); and *Ada Mendoza v. Desert Valley Date, LLC*,
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1 *et al.*, Case No. CVRI2301048, Riverside County Superior Court, Honorable Harold W. Hopp,
2 presiding (using an hourly rate of \$550 for work performed in 2023-2026).

3 6. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation
4 since its inception. The details of the work completed by Class Counsel in this case are set forth
5 in the declaration of Matthew K. Moen, filed concurrently herewith.

6 7. I confirm that I do not have any interest or involvement in, and am not affiliated
7 with, the proposed settlement administrator, Apex Class Action Administration.

8 8. After conducting a reasonable inquiry, I am not aware of any class, representative
9 or other collective action pending in any court that asserts claims similar to those in this action
10 that could be extinguished or adversely affected by this Settlement

11 I declare under penalty of perjury under the laws of the United States and the state of
12 California that the foregoing is true and correct. Executed on May 5, 2026, at El Segundo,
13 California.

14 
15 Susan J. Perez