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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

SANDRA BRAVO, as an individual and on behalf of all others similarly situated,

Plaintiff,

vs.

FOOTHILL CHILD DEVELOPMENT SERVICES, INC., a California Corporation; and DOES 1 through 100,

Defendants.

Case No.: 24STCV18240

[*Case Assigned for all purposes to the Hon. Timothy Patrick Dillon, Dept. SSC-15*]

DECLARATION OF SUSAN J. PEREZ IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT

Date: January 13, 2027
Time: 10:00 a.m.
Dept.: SSC-15

Complaint Filed: July 23, 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 Sandra Bravo ("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.*

Ernie Ball, Inc., San Luis Obispo County Superior Court, Case No. 21CV-0016; *Erving v. Lazer Spot, Inc.*, San Bernardino County Superior Court, Case No. CIVSB2101370; *Santiago Gutierrez v. M.M.C.L., Inc.*, Orange County Superior Court, Case No. 30-2021-01182371 (awarding attorney's fees following a lodestar cross-check based on an hourly rate of $475 for work performed in 2022-2023); *Robert Lewis v. IMERYS Filtration Minerals, Inc., et al*., Santa Barbara County Superior Court, Case No. 22CV02874 (awarding attorney's fees following a lodestar cross-check based on an hourly rate of $475 for work performed in 2022-2023); *Gerardo Sanchez v. Dutton Home Services, LLC,* Los Angeles County Superior Court, Case No. 22STCV01834 (awarding attorney's fees following a lodestar cross-check based on an hourly rate of $475 for work performed in 2022-2023); *Aaron Hallum, et al. v. FCA US, LLC*, Case No. CIVDS1936782, San Bernardino County Superior Court, Honorable Joseph T. Ortiz, presiding (awarding attorney's fees following a lodestar cross-check based on an hourly rate of $475 for work performed in 2022-2024); *Rafael Perez, et al. v. Kyocera SGS Precision Tools, Inc.*, Case No. 30-2022-01299232-CU-OE-CXC, Orange County Superior Court, Honorable Randall J. Sherman, presiding (awarding attorney's fees following a lodestar cross-check based on an hourly rate of $475 for work performed in 2022-2024); *Juan David Arreola Carrillo v. KPS Global, LLC*, Case No. 22STCV19527, Los Angeles County Superior Court, Honorable Samantha Jessner, presiding (awarding attorney's fees following a lodestar cross-check based on an hourly rate of $550 for work performed in 2022-2025); *In Re: Stanislaus Food Products Company Employment Cases*, Lead Case No. CV-23-001433, Stanislaus County Superior Court, Honorable John D. Freeland, presiding (using an hourly rate of $550 for work performed in 2023-2025); *Elia Paredes Acosta vs. Defendant SMG/Long Beach Convention and Entertainment Center*, Case No. 21STCV27103, Los Angeles County Superior Court, Honorable Theresa M. Traber, presiding (awarding attorney's fees following a lodestar cross-check based on an hourly rate of $550 for work performed in 2022-2025); *Ada Mendoza v. Desert Valley Date LLC*, Case No. CVRI2301048, Riverside County Superior Court, Honorable Harold W. Hopp presiding (awarding attorney's fees following a lodestar cross-check based on an hourly rate of $550 for work performed in 2023-2026); *Daniel McCabe v. Summit Electrical, Inc.*, Case No. 37-2024-00012319-CU-OE-CTL,

San Diego County Superior Court, Honorable Gregory W. Pollack presiding (using an hourly rate of $550 for work performed in 2023-2026); *Brianna McCulin v. South Coast Children's Society, Inc.*, Case No. 25STCV09319, Honorable Elaine Lu presiding (awarding attorney's fees following a lodestar cross-check based on an hourly rate of $600 for work performed in 2025-2026); and *Jose Moran v. Araca Merchandise L.P. et al.*, Case No. 24STCV02003, Los Angeles County Superior Court, Honorable William F. Highberger presiding (awarding attorney's fees following a lodestar cross-check based on an hourly rate of $600 for work performed in 2024-2026).

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

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

8. I confirm that I do not have any interest or involvement in, and am not affiliated with, the proposed *cy pres* recipient, Learning Rights Law Center.

9. I am not aware of any other class, representative, or other collective actions in any other court or jurisdiction that assert claims similar to those asserted in this action on behalf of a class or group of individuals some or all of whom would also be members of the class defined in this action.

I declare under penalty of perjury under the laws of the United States and the state of California that the foregoing is true and correct. Executed on October 21, 2026, at El Segundo, California.

Susan J. Perez