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Attorneys for Defendant PATH (f/k/a as 'People Assisting The Homeless')

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

AARON CLAYTON WILSON AND
NATHANIEL GARCIA CLAUDIO,
individually, and on their own behalf and
on behalf of all other similarly situated,

Plaintiff,

vs.

PEOPLE ASSISTING THE HOMELESS,
a California non-profit corporation; and
DOES 1 through 100, inclusive,

Defendants.

CASE NO. 24STCV17152

Assigned For All Purposes To:

Hon. Elaine Lu

Dept.: 9

**DECLARATION OF ERIN R. EZRA
IN SUPPORT OF CY PRES
RECEIPT**

Complaint Filed: July 10, 2024

Trial Date: None Set

1 I, Erin R. Ezra, declare as follows:

2 1. I am an attorney with Berger Kahn, A Law Corporation, counsel of record
3 for PATH in this matter. The facts in this declaration are personally known to me, and I
4 could and would testify competently to them under oath if called to do so.

5 2. I have never been employed by, or otherwise previously worked with the
6 Cy Pres recipient, Destination Home.

7 3. To the best of my knowledge, no one in my firm previously worked with
8 the Cy Pres recipient, Destination Home.

9 4. To the best of my knowledge, neither myself nor anyone in my firm has
10 any interest or relationship, financial or otherwise, with the intended Cy Pres recipient,
11 Destination Home.

12 5. I first discovered Destination Home around October 17, 2025. After
13 reviewing publicly available information, I determined that Destination Home is a
14 nonprofit organization whose projects will support persons similarly situated to the class
15 members in this lawsuit, that Destination Home's mission aligns with that of PATH, and
16 that Destination Home would be a suitable Cy Pres beneficiary in this matter.

17 6. Destination Home's mission aligns with that of PATH and Destination
18 Home serves the same population as PATH -- individuals experiencing, or at-risk of,
19 homelessness -- and provides services complimentary to those PATH provides.
20 Destination Home supports homeless prevention systems, supportive housing
21 developments and interim shelters that help individuals experiencing homelessness and
22 high-risk households.

23 7. Destination Home and PATH also employ individuals from the same
24 community with the same motivations. Many employees working in this industry do so
25 to serve a disadvantaged and under-resourced population. I believe Destination Home is
26 a suitable beneficiary to benefit the class and similarly situated individuals.

27 7. These are the only reasons that Destination Home was chosen as the
28 proposed Cy Pres beneficiary. I do not have a prior connection to or relationship with

1 Destination Home that could have influenced the decision to propose Destination Home
2 as the Cy Pres beneficiary.

3 I declare under penalty of perjury under the laws of the State of California and the
4 United States of America that the foregoing is true and correct.

5 Executed on November 28, 2025, in Lake Forest, California.

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8 ERIN R. EZRA
9 Berger Kahn, A Law Corporation
10 Counsel for PATH
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