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Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IGNACIO PEREZ, on Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

v.

RASH CURTIS & ASSOCIATES,

Defendant.

Case No. 4:16-cv-03396-YGR

**DECLARATION OF IGNACIO PEREZ
IN SUPPORT OF PLAINTIFF'S NOTICE
OF MOTION AND MOTION FOR AN
AWARD OF ATTORNEY'S FEES,
COSTS AND EXPENSES, AND
SERVICE AWARD FOR THE CLASS
REPRESENTATIVE**

Judge: Hon. Yvonne Gonzalez Rogers

DECLARATION OF IGNACIO PEREZ

I, Ignacio Perez, declare as follows:

1. I am the Class Representative in the lawsuit entitled *Perez v. Rash Curtis & Associates*, Case No. 4:16-cv-03396-YGR. I make this Declaration in Support of Plaintiff's Motion for an Award of Attorney's Fees, Costs and Expenses, and Service Award for the Class Representative.

2. I assisted with my lawyers' investigation of this case and provided detailed information about the calls I received from the Defendant.

3. During the course of the litigation, I kept in regular contact with my lawyers. Specifically, I conferred with them regularly by phone, in multiple in-person meetings, and e-mail to discuss the status of the case. We also discussed case strategy, pending and anticipated motions, the prospects of settlement, the likelihood of this case going through trial, and post-trial strategy.

4. I spent significant time with my lawyers and on my own preparing to testify at my deposition and at the trial. I have had to sacrifice a tremendous amount of personal and professional time to prosecute this case. For instance, because I am a personal care-taker, I had to travel back and forth from Sacramento (where I live) to Oakland both of the days I appeared at trial.

5. Based on my interactions and my relationship with my attorneys, I believe they have fairly and adequately represented me and the other class members and will continue to do so.

6. Throughout this litigation, I understood that, as a Class Representative, I have an obligation to protect the interests of the other class members and not act just for my own personal benefit. I also understand that, although the trial has been won, the case is not over. Defendant will likely file an appeal and may file bankruptcy and, as a result, this case may proceed for a long time before I, my attorneys, and other class members are paid. Nonetheless, I am committed to seeing this case through the end. I have done my best to protect the interests of the other class members and will continue to fairly and adequately represent the class members to the best of my ability.

1 7. The above statements are of my own personal knowledge, and I make such
2 statements under penalty of perjury under the laws of California and the United States of America.

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4 Executed September 21, 2019.



Ignacio Perez

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