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Attorneys for Plaintiffs TODD PERRY (Individually and as Trustee of PERRY LIVING TRUST), and ELIZABETH PERRY (Individually and as Trustee of PERRY LIVING TRUST) on behalf of themselves and all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF ORANGE**

GLENN LINDGREN, an individual,  
CALVIN DUONG, an individual; ROBERT TRUJILLO, an individual; KELLY TRUJILLO, an individual; SANDRA SMITH, an individual; DAN O'HARA, an individual; EDEN O'HARA, an individual; TODD PERRY, Individually and as Trustee of the PERRY LIVING TRUST, and ELIZABETH PERRY, Individually and as Trustee of the PERRY LIVING TRUST; on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

SHEA HOMES, INC., a Corporation;  
PLUMBING CONCEPTS, INC., a Corporation; MUELLER INDUSTRIES, INC., a Corporation; and DOES 1-100,

Defendants.

AND RELATED CROSS-CLAIM.

CASE NO. 30-2013-00649466-CU-CD-CXC  
Assigned for all purposes to:  
Judge Peter Wilson  
Dept. CX-101

**DECLARATION OF TODD PERRY  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

**Hearing Date: June 29, 2023**

**Time: 2:00 p.m.**

**Dept.: CX-101**

Complaint Filed: 05/09/2013

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1. I am over the age of 18 years and am one of the class representatives in the above-captioned class action. I have personal knowledge of the matters contained in this declaration and if called to testify, I would and could competently testify to such matters. I make this declaration upon my personal knowledge and, if called upon and sworn as a witness, I could and would competently testify hereto.

3. I submit this declaration in support of the motion for preliminary approval of class settlement.

5. I have been kept apprised of this case through Plaintiff's counsel since I became involved in this action in early 2021, when I retained plaintiffs' counsel.


7. I have actively worked with my attorneys to assist them in litigating this case, and in the settlement discussions. I have also engaged in several discussions with my counsel regarding the details and status of the lawsuit and settlement. My counsel has routinely informed me of the status of the case and has attended to my questions and concerns about the litigation on

1 my behalf and all similarly situated. I will continue to remain engaged in this lawsuit through  
2 the duration of the litigation and diligently discharge my duties as class representative.

3 8. My counsel has explained to me the terms of the proposed Settlement and  
4 answered all questions that I had about its terms. I was fully advised as to the provisions of the  
5 proposed Settlement and have reviewed the entire agreement before executing it. I fully support  
6 the terms reached within the Settlement and find it to be fair and reasonable when taking into  
7 account all aspects of this litigation and the risks as have been explained to me by my counsel.

8 9. I am currently not party to, nor have I been a party to at any time during the  
9 course of this litigation, any cases which are similar to this case pending in other jurisdictions.

10  
11 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
12 true and correct. Executed on April 10, 2023, at Ladera Ranch, California.

13  
14   
15 Todd Perry



**SERVICE LIST**

**Lindgren v. Shea Homes, Inc., et al.**

**Orange County Superior Court Case No.: 30-2013-006494606**

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