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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 ELIZABETH 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

1 **DECLARATION OF ELIZABETH PERRY**

2 I, ELIZABETH PERRY, declare as follows:

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

8 2. I am represented by my counsel Bridgford, Gleason & Artinian, Kabateck LLP
9 and McNicholas & McNicholas LLP.

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

12 4. I am a class member in this class action and have been asked to serve as one of
13 the class representatives in this action. My husband and I are owners of 36 Abyssinian, Ladera
14 Ranch, CA 92694 – a home included within this class action.

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

17 6. My counsel has explained to me what my obligations are for serving as a class
18 representative in this matter, and I take those obligations seriously and intend to carry out those
19 obligations to the best of my ability. I understand that I may not put my personal interests ahead
20 of the Class Members’ interests as a whole and that my interests cannot be antagonistic to those
21 of the Class. My interests align with those of the Class, because the Class and I share the mutual
22 interest of establishing Defendant’s liability and obtaining relief for the Class.

23 7. I have actively worked with my attorneys to assist them in litigating this case, and
24 in the settlement discussions. I have also engaged in several discussions with my counsel
25 regarding the details and status of the lawsuit and settlement. My counsel has routinely informed
26 me of the status of the case and has attended to my questions and concerns about the litigation on
27

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.

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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.

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14 
15 Elizabeth Perry

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

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Dept: CA-101
Complaint Filed: 04/10/2023

SERVICE LIST

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

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

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