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8 NEXT LEVEL DOOR & MILLWORK, INC.

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF RIVERSIDE

12 FELIX REY GUTIERREZ, individually, and  
on behalf of all others similarly situated,

13 Plaintiff,

14 v.

15 NEXT LEVEL DOOR & MILLWORK, INC.,  
16 a California corporation; and DOES 1 through  
10, inclusive,

17 Defendants.

Case No. CVRI2105455

**DECLARATION OF APRIL L. SZABO IN  
SUPPORT OF PLAINTIFF'S MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT  
AGREEMENT**

Judge: Hon. Harold Hopp  
Dept.: 1

Complaint Filed: November 30, 2021  
Trial Date: Not Set

19  
20 **DECLARATION OF APRIL L. SZABO**

21 I, April L. Szabo, declare as follows:

22 1. I am an attorney at law duly admitted to practice before all courts in the State of  
23 California. I am an associate attorney in the law firm of Atkinson, Andelson, Loya, Ruud & Romo  
24 ("AALRR"), attorneys of record for Defendant Next Level Door & Millwork, Inc. ("NLD") in the  
25 above-entitled action. I am one of the attorneys primarily responsible for the handling of the  
26 above-captioned matter on behalf of NLD. I have personal knowledge of the matters in this  
27 declaration, and I could and would testify competently thereto.

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1 2. I submit this declaration in support of Plaintiff Felix Rey Gutierrez’s Motion for  
2 Preliminary Approval of Class Action Settlement

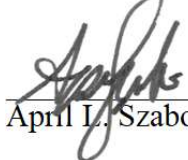
3 3. I make this declaration regarding other pending matters or actions asserting claims  
4 that may be adversely affected by the Class Action Agreement (“Agreement”) entered into by  
5 Plaintiff and NLD, and regarding any potential conflict of interest as to the proposed cy pres  
6 recipient, Legal Aid at Work.

7 4. The parties have designated the nonprofit Legal Aid at Work as the beneficiary to  
8 receive any uncashed settlement funds in connection with the proposed class action settlement in  
9 this matter.

10 5. Pursuant to the Court’s Class Action Case Management Order #1, **Section G(3)(b)**,  
11 NLD and its counsel, including myself, are not aware of any class, representative or other  
12 collective action in any other court in this or any other jurisdiction that asserts claims similar to  
13 those asserted in this action on behalf of a class or group of individuals some or all of whom  
14 would also be members of the class defined in this action.

15 6. Pursuant to the Court’s Class Action Case Management Order #1, **Section**  
16 **G(3)(c)(iv)**—I have no relationship or affiliation with Legal Aid at Work. I have also made a  
17 reasonable inquiry with the my colleague, William M. Betley, the other attorney primarily  
18 responsible for the handling of the above-captioned matter on behalf of NLD, and have confirmed  
19 that neither Mr. Betley nor the law firm of AALRR represents or has any relationship with Legal  
20 Aid at Work that could reasonably create the appearance of impropriety as between the selection  
21 of Legal Aid at Work as the recipient of uncashed funds and the interests of the class. We have  
22 also consulted with our client, NLD, and have confirmed that they have no relationship  
23 whatsoever with the proposed cy pres recipient.

24 7. I declare under penalty of perjury under the laws of the State of California that the  
25 foregoing is true and correct, and that this declaration was executed on this 6th day of July, 2023,  
26 at Concord, New Hampshire.

27   
April L. Szabo