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Attorneys for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JUAN QUINTANILLA VASQUEZ, GABRIELA
PERDOMO ORTIZ, VICTOR HUGO CATALAN
MOLINA, and KEVIN CALDERON, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

LIBRE BY NEXUS, INC. and JOHN DOES 1-50,

Defendants.

CASE NO. 4:17-cv-00755-CW

**DECLARATION OF JESSE NEWMARK
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: Dec. 9, 2020

Time: 2:30 p.m.

Courtroom: 6

Judge: Hon. Claudia Wilken

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I, Jesse Newmark, declare:

1. I am an attorney of record for Plaintiffs and the class in this case. I am a member of the California bar and admitted to practice before this Court. I have personal knowledge of all of the facts set forth in this declaration unless otherwise stated, and I am competent to testify to these facts if called on to do so.

2. While the parties were memorializing their agreement to a settlement in principle, the global COVID-19 pandemic arrived in the United States. As a result, the parties returned to an additional full day mediation with Jill Sperber to negotiate the agreed payment plan.

3. Plaintiffs and Defendant Libre by Nexus agree that the Settlement Agreement release for class members does not extend to personal injury claims because the release is limited to claims that arise from the facts alleged in this action.

I declare under penalty of perjury under the laws of California and the United States that the foregoing is true and correct, and that this declaration was executed in Oakland, California, on November 9, 2020.

/s/ Jesse Newmark
Jesse Newmark