

CAUSE NO. 202184322

CLIFF LEE, DANIEL FLADING, AND	:	IN THE DISTRICT COURT OF
CAROLYN TOEPFER	:	
individually and on behalf of all others	:	
similarly situated,	:	
	:	
	:	
Plaintiff,	:	
	:	HARRIS COUNTY, TEXAS
v.	:	
	:	
TEXAS EAR, NOSE & THROAT SPECIALISTS,	:	
PLLC	:	
Defendant.	:	295TH JUDICIAL DISTRICT
_____	:	

**DECLARATION OF DANIELLE L. PERRY IN SUPPORT OF
PLAINTIFFS’ MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

I, Danielle L. Perry, being competent to testify, make the following declaration:

1. I am currently a partner of the law firm Mason LLP. I am one of the lead attorneys for Plaintiffs and have been appointed by the Court as Class Counsel for the proposed Settlement Class. I submit this declaration in support of Plaintiffs’ Motion for Final Approval of Class Action Settlement. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration, and could testify competently to them if called upon to do so.

2. Class Counsel has not received any objection to the Settlement Agreement or to the pending motion and request for attorneys’ fees, costs, and service awards.

3. Class Counsel and Plaintiffs have approved the Settlement.

* * * * *

I declare under penalty of perjury of the laws of the State of Texas and the United States that the foregoing is true and correct, and that this declaration was executed on this 21st day of November, 2023.

/s/ Danielle L. Perry

Danielle L. Perry (admitted *pro hac vice*)

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