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Attorneys for Plaintiffs, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

JODIE BLANTON JR., YAZMIN
CORTES, and GABRIELA ESCRIBA,
individually, on a representative basis, and
on behalf of all others similarly situated;

Plaintiffs,

vs.

COMMUNICATIONS TEST DESIGN,
INC., a Pennsylvania Corporation; and
DOES 1 through 20, inclusive;

Defendants.

Case No.: STK-CV-VOE-2021-5136

[Assigned to Hon. Judge Robert T. Waters, Dept.
11B, for all purposes]

**DECLARATION OF NICHOLAS
ROSENTHAL IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: August 23, 2023

Time: 9:00 A.M.

Dept.: 11B

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I, Nicholas Rosenthal, hereby declare and state as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Diversity Law Group, P.C., counsel of record for Plaintiff Jodie Blanton Jr. ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. The Class and Representative Action Settlement Agreement and Release of Claims (“Settlement Agreement” or “Agreement”) was the product of negotiation between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed.

3. The settlement in the case at bar warrants approval and carries a presumption of fairness. As previously noted in the application for Preliminary Approval, this current settlement was negotiated at arm's length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Class Members as a whole.

4. I am one of the primary attorneys on this matter. My qualifications are as follows: I received my *Juris Doctorate* degree from USC Gould Law School in 2009. Upon graduation, I was employed as an associate for approximately 4 years at Seyfarth Shaw LLP, a national employment defense law firm. While at Seyfarth my practice was exclusively labor & employment defense and I represented numerous corporations in large employment class actions.

5. I have been certified as class counsel in a number of cases, including *Pittman v. Martinez Steel Corporation*, San Bernardino County Superior Court Case No. CIVDS1823132, *Della Maggiora v. Watsonville Community Hospital*, Santa Cruz County Superior Court Case No. 18CV00191, *Randolph v. Pacific Racing Association*, Alameda County Superior Court Case No. RG18908139, *Morones v. Bimbo Bakeries USA, Inc.*, Sacramento County Superior Court Case No. 34-2018-00245481-CU-OE-GDS *Foaad Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No. BC720144; *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-

005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San Bernardino Superior Court Case No. CIVDS1828867, *Pascual v. Satellite Healthcare, Inc.*, Santa Clara County Superior Court Case No. 19CV345211; *Carrillo v. New Balance Athletics, Inc.*, Santa Clara County Superior Court Case No. 19CV352469; *Vogel v. Veolia North America, LLC*, Monterey County Superior Court Case No. 19CV001443; *Holman v. American Sugar Refining, Inc.*, Contra Costa County Superior Court Case No. MSC18-00415; *Chavez v. Converse, Inc.*, United States District Court, Northern District of California Case No. 15-cv-03746-NC; *Gutierrez v. Spa Havens, LP*, San Diego Superior Court Case No. 37-2019-00057065-CU-OE-NC; *Cruzado v. Ontario T, Inc.*, San Bernardino Superior Court Case No. CIVSB2027249; *Ray v. C&W Facility Services, Inc.*, San Bernardino Superior Court Case No. CIVSB2101321; *Alvarez v. Forterra Building Products*, San Diego Superior Court Case No. 37-2020-00018179-CU-OE-CTL; *Dunn v. Universal Plant Services of California, Inc.*, Solano County Superior Court Case No. FCS056134, *Pulido v. Georgia-Pacific Corrugated III LLC*, Fresno Superior Court Case No. 18CECG00265; and *In re: FPI Management Wage and Hour Cases*, Los Angeles Superior Court Case No. JCCP5050.

6. My firm has incurred costs in the amount of \$5,895.95. The costs are all litigation related costs, including filing fees, service costs, and mediation fees. Attached hereto as **Exhibit A** is copy of the costs my firm has incurred in connection with prosecution of this lawsuit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 17th day of July 2023, at Los Angeles, California.



Nicholas Rosenthal

EXHIBIT A

7/13/2023
9:47 AM

DIVERSITY LAW GROUP
Slip Listing

Page 1

Selection Criteria

Slip Classification Open
Client (hand select) Include: Blanton Jr., Jodie v Communica
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
67632	EXP	Olympia	1	6.96	6.96
5/31/2021		Postage			
WIP		Blanton Jr., Jodie v Communi			
Postage					
67439	EXP	Linda Lee	1	75.00	75.00
6/2/2021		Court fees			
WIP		Blanton Jr., Jodie v Communi			
LWDA					
67919	EXP	Linda Lee	1	16.00	16.00
6/2/2021		Court fees			
WIP		Blanton Jr., Jodie v Communi			
San Bernardino					
67786	EXP	Olympia	1	1727.79	1727.79
6/7/2021		Atty Service			
WIP		Blanton Jr., Jodie v Communi			
Attorney Service - Complaint					
67831	EXP	Olympia	1	68.74	68.74
6/17/2021		Atty Service			
WIP		Blanton Jr., Jodie v Communi			
Attorney Service - Complaint Service					
68347	EXP	Olympia	1	144.29	144.29
7/12/2021		Atty Service			
WIP		Blanton Jr., Jodie v Communi			
Attorney Service - POS of Summons					
68911	EXP	Olympia	1	178.04	178.04
8/26/2021		Atty Service			
WIP		Blanton Jr., Jodie v Communi			
Attorney Service - Stipulation and Proposed Order					
69141	EXP	Erika Mejia	1	145.79	145.79
9/9/2021		Atty Service			
WIP		Blanton Jr., Jodie v Communi			
Attorney Service - Notice					

7/13/2023
9:47 AM

DIVERSITY LAW GROUP
Slip Listing

Page 2

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
69979	EXP	Olympia	1	143.60	143.60
11/18/2021		Atty Service			
WIP		Blanton Jr., Jodie v Communi			
Attorney Service - CMS					
70993	EXP	Olympia	1	2750.00	2750.00
3/8/2022		Arbitrators			
WIP		Blanton Jr., Jodie v Communi			
Mark S. Rudy Mediation					
72379	EXP	Erika Mejia	1	157.04	157.04
6/7/2022		Atty Service			
WIP		Blanton Jr., Jodie v Communi			
Attorney Service - CMS					
72437	EXP	Kristen Agnew	1	31.42	31.42
6/7/2022		Meals			
WIP		Blanton Jr., Jodie v Communi			
Meal					
74362	EXP	Erika Mejia	1	241.09	241.09
1/11/2023		Atty Service			
WIP		Blanton Jr., Jodie v Communi			
Attorney Service - Stip					
74388	EXP	Erika Mejia	1	210.09	210.09
1/26/2023		Atty Service			
WIP		Blanton Jr., Jodie v Communi			
Attorney Service - NOE					
Grand Total					
			Billable	0.00	5895.85
			Unbillable	0.00	0.00
			Total	0.00	5895.85