

DENNIS F. MOSS (SBN 77512)
JEREMY F. BOLLINGER (SBN 240132)
ARI E. MOSS (SBN 238579)
MOSS BOLLINGER LLP
15300 VENTURA BLVD., STE. 207
SHERMAN OAKS, CALIFORNIA 91403
TELEPHONE: (310) 982-2984
FACSIMILE: (818) 963-5954
dennis@mossbollinger.com
jeremy@mossbollinger.com
ari@mossbollinger.com

Attorneys for Scott Shuster

SUPERIOR COURT OF CALIFORNIA

COUNTY OF ORANGE

DOMINGO MURCHISON, individually and
on behalf of all current and former similarly
situated employees in the State of California

Plaintiff,

vs.

MVP EVENT PRODUCTIONS, LLC, a
California Limited Liability Company dba
MVP EVENT STAFFING; GREGORY
FIELDING, an individual; LEGENDS
HOSPITALITY, LLC, a Delaware Limited
Liability Company (previously designated by
the fictitious name of "DOE 1"; and DOES 2
to 50,

Defendants.

CASE NO.: 30-2021-01234789-CU-OE-CXC

[Assigned for All Purposes to William D.
Claster, Dept. CX101]

**DECLARATION OF DENNIS F. MOSS IN
SUPPORT OF SCOTT SHUSTER'S
"ARGUMENTS & EVIDENCE" IN
OPPOSITION TO PROPOSED
SETTLEMENT UNDER PRIVATE
ATTORNEYS GENERAL ACT**

Date: August 1, 2025

Time: 9:00 a.m.

Dept: CX101

I, Dennis F. Moss, declare:

2. Shuster and Defendant Legends attended a mediation of the *Shuster* Action in 2024. The case did not settle. Thereafter, unbeknownst to Shuster, me and my co-counsel, Defendant Legends in the *Murchison* Action, took it upon itself to deputize its own plaintiffs of choice, Domingo Murchison and Davina Bhullar, to negotiate a settlement of the *Shuster* PAGA claims as well as the PAGA claims in *Crook v. Legends Hospitality, LLC et al.*; Los Angeles Superior Court Case No. 23STCV24567 (“*Crook*” Action) and *Martinez v. Legends Hospitality, LLC*; Orange County Superior Court Case No. 30-2024-01380394-CU-OE-CXC (“*Martinez*” Action) at a mediation to which *Shuster* and his counsel were not a party nor even aware.

4. **Exhibit 2** to the RFJN is a true and correct copy of the Complaint filed in the *Martinez* Action filed on February 16, 2024.

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DECLARATION OF DENNIS F. MOSS

5. **Exhibit 3** to the RFJN is a true and correct copy of the Third Amended Complaint filed in the *Shuster* Action filed on August 26, 2026.

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

Executed this 29th day of July 2025, at Sherman Oaks, California.

/s/Dennis F. Moss

DENNIS F. MOSS