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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

DFT, INC. WAGE AND HOUR CASES

Coordinated Actions:

ERIC BETANCES vs. DFT, INC. D/B/A
CANNON MANAGEMENT

ROXANA VALDEZ vs. DFT, INC.
D/B/A CANNON MANAGEMENT

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO.: 4882

Honorable John S. Wiley, Jr.
Department SSC9

Superior Court of California, County of Los
Angeles: BC559751

Complaint Filed: October 6, 2014

Superior Court of California, County of San
Bernardino: CIVDS1605358

Complaint Filed: April 12, 2016

**DECLARATION OF V. ANDRE SHERMAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Plaintiffs' Motion for Preliminary Approval of
Class Action Settlement; Declaration of Proposed
Class Counsel (Edwin Aiwazian); Declarations of
Proposed Class Representatives (Eric Betances
and Roxana Valdez); and [Proposed] Order filed
concurrently herewith.]

Date: June 13, 2018
Time: 10:00 a.m.
Department: 9

DECLARATION OF V. ANDRE SHERMAN

I, V. Andre Sherman, hereby declare:

1. I am an attorney licensed to practice law in the State of California. I am a member of Girardi & Keese, attorneys of record for Plaintiffs Eric Betances and Roxana Valdez ("Plaintiffs"). I make this declaration of my personal knowledge and/or based on information and belief, and could testify thereto if called as a witness.

2. Girardi & Keese has been in existence for over thirty-six (36) years, has eleven (11) members who are members of the American Board of Trial Advocates, and represents all types of individuals and businesses. The firm represents clients in both state and federal courts in California and across the nation.

3. The law firm of Girardi & Keese has extensive experience of success in pursuing claims on behalf of classes and large groups of plaintiffs. Below is a partial list of class actions and multi-plaintiff litigation in which Girardi & Keese has worked or is currently working:

- *In Re: Aredia AMD Zometa*, Middle District of Tennessee Case No. 3:06-MDL-1760. This matter involves representation of approximately 250 plaintiffs against the pharmaceutical company Novartis for the failure to warn of a serious jaw injury as an unwarned consequence of the use of the drug Zometa.
- *MDL232 In Re: National Football League Players' Concussion Injury Litigation*. Girardi & Keese represents 675 former professional football players against the National Football League for personal injury and for medical or monitoring of brain injury as a result of multiple incidents of brain trauma.
- *Grass Valley Litigation*, San Bernardino Superior Court Case No. CIVSS811370. This action involves claims for property losses and inverse condemnation of 128 property owners whose homes were destroyed in a fire caused by Southern California Edison equipment malfunction.
- *Aguayo, et al. v. Betz Laboratories, Inc., et al.*, Los Angeles County Superior Court Case No. BC123746 and *Addison v. Pacific Gas and Electric, et al.*, Los Angeles County Superior Court Case No. BC158588, represented over

1 600 plaintiffs claiming personal injury due to water contamination caused by
2 the dumping of Chromium VI;

- 3 • *Acosta v. Betz Laboratories, Inc., et al.*, Los Angeles County Superior Court, Case
4 No. BC161669, represented 1,000 plaintiffs on claims similar to those in *Aguayo*;
- 5 • *Adams v. Pacific Gas and Electric*, Los Angeles County Superior Court Case No.
6 BC113000, represented 650 plaintiffs claiming personal injuries from exposure to
7 Chromium VI;
- 8 • *West, et al. v. LeBoeuf, Lamb, Greene & MacRae, a Partnership, et al.*, Los Angeles
9 Superior Court, Case No. BC133060, represented 230 investors in Lloyd's of London
10 who suffered huge monetary losses as individual Underwriters at Lloyd's due to
11 participation in Lloyd's Syndicates which suffered devastating losses from poor
12 investments;
- 13 • *Allegro v. State Farm Automobile Insurance Co.*, Los Angeles County Superior
14 Court, Case No. BC126014, represented more than 100 plaintiffs insured by the
15 defendants for earthquake coverage;
- 16 • *Carrillo v. Rent-A-Center, Inc.*, San Diego Superior Court Case No. JCCP 4244,
17 representing a class of consumers who participated in "rent-to-own" programs which
18 allegedly violate portions of the Karmette Rental Purchase Act;
- 19 • *Gonzales v. Lloyds TSB Bank, plc*, United States District Court, Central District of
20 California Case No. 06-1433 VBF (JTLx) that resulted in more than \$17 million
21 settlement on behalf of hundreds of Ponzi scheme victims;
- 22 • *Natural Gas Anti-Trust Cases I, II, III & IV*, San Diego Superior Court Case Nos.
23 JCCP 4221, 4224 and 4226; In *Natural Gas Anti-Trust Cases I, II, III & IV*, San
24 Diego Superior Court Case Nos. JCCP 4221, 4224 and 4226, recovered more than \$2
25 billion on behalf of consumers overcharged for natural gas during the California
26 energy crisis in 2000 and 2001 through close work by a committee of firms.

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1 4. Girardi & Keese has served as lead, liaison, and executive committee counsel on
2 numerous local and national multi-plaintiff pharmaceutical, business, antitrust, and product
3 defect cases.

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

6 Executed on this _____ day of May 2018, at Los Angeles, California.

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V. Andre Sherman

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