

Larry W. Lee (State Bar No. 228175)  
lwlee@diversitylaw.com

Kristen Agnew (State Bar No. 247656)  
kagnew@diversitylaw.com

Nicholas Rosenthal (State Bar No. 268297)  
nrosenthal@diversitylaw.com

Max W. Gavron (State Bar No. 291697)  
mgavron@diversitylaw.com

**DIVERSITY LAW GROUP, A Professional Corporation**

515 S. Figueroa St., Suite 1250

Los Angeles, CA 90071

(213) 488-6555

(213) 488-6554 facsimile

WILLIAM L. MARDER, ESQ. (State Bar No. 170131)

**Polaris Law Group LLP**

501 San Benito Street, Suite 200

Hollister, CA 95023

Tel: (831) 531-4214

Fax: (831) 634-0333

Email: bill@polarislawgroup.com

Dennis S. Hyun (State Bar No. 224240)

dhyun@hyunlegal.com

**HYUN LEGAL, APC**

515 S. Figueroa St., Suite 1250

Los Angeles, CA 90071

(213) 488-6555

(213) 488-6554 facsimile

Attorneys for Plaintiff and the Class

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

ERIC CHAVEZ, as an individual and on  
behalf of all others similarly situated,

Plaintiffs,

vs.

CONVERSE, INC., a Delaware  
corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No.: 15-cv-03746-NC

**DECLARATION OF NICHOLAS  
ROSENTHAN IN SUPPORT OF  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: July 8, 2020

Time: 1:00 p.m.

Courtroom: 5, 4<sup>th</sup> Floor

Judge: Hon. Nathanael Cousins

**DECLARATION OF NICHOLAS ROSENTHAL**

I, Nicholas Rosenthal, declare 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 Eric Chavez ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I am one of the primary attorneys on this matter. My qualifications are as follows: I received my JD from University of Southern California Gould School of Law in 2009. Upon graduation, I practiced law as an associate at Seyfarth Shaw LLP, representing corporate clients in both single-plaintiff and wage hour class actions. In 2014, I began as an associate at Diversity Law Group.

3. I have handled a number of wage and hour matters including class actions and multiple-plaintiff actions. I have been named as Class Counsel in a number of class actions that have been granted certification or preliminary or final approval by the Superior Courts of Los Angeles County, Orange County, Alameda County, and Monterey County, the United States District Court for the Central District of California, and the United States District Court for the Northern District of California. These cases include, but are not limited to: *Diller v. Under Armour Retail, Inc.*, Santa Clara County Superior Court Case No. 114-CV-265729, *Dall v. Post Alarm Systems*, Los Angeles County Superior Court Case No. BC598528, *Lopez v. Imperial Body Shop, Inc.*, Orange County Superior Court Case No. Case No. 30-2015-00816193-CU-OE-CXC, *Hughes v. Lincare, Inc., et al.*, Monterey County Superior Court Case No. M124764, *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, *Chavez v. Converse, Inc.*, United States District Court – Northern District of California Case No. 15-cv-03746-NC, and *Rodriguez v. Nike Retail Services, Inc.*, United States District Court – Northern District of California Case No. 5:14-CV-1508 BLF.

4. Based on my own independent investigation and evaluation, I am of the opinion that the settlement for the consideration and on the terms set forth in the Settlement Agreement is fair,

1 reasonable, and adequate and that the settlement is in the best interests of the Settlement Class, in light  
2 of all known circumstances and the expenses and risks inherent in litigation. I also believe in the fairness  
3 of the settlement based on factoring in the uncertainty and risks to Plaintiff involved in not prevailing on  
4 his certified class claims at trial and the possibility of appeals.

5 5. I have no conflicts with the class and will adequately represent the class.

6 6. I do not have any relationship with Legal Aid at Work.

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

9 Executed on this 3rd day of June, 2020, at Los Angeles, California.

10  
11 

12  
13 \_\_\_\_\_  
14 Nicholas Rosenthal  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28