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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

10 E. DAMIANO, an individual, individually and
11 on behalf of all others similarly situated,

12 Plaintiff,

13 v.

14 FABLETICS, LLC, a Delaware Limited
15 Liability Company; TECHSTYLE, INC., a
16 Delaware Corporation; ADAM
17 GOLDENBERG, an individual; and DOE 1
18 through and including DOE 10,

19 Defendants.

Case No: 24STCV15783
Assigned to Hon. William F. Highberger,
Dept. 10

**DECLARATION OF CONOR J. DALE IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 24, 2026
Time: 11:00 a.m.
Dept.: 10
Spring Street Courthouse
312 N. Spring Street
Los Angeles, CA 90012

Complaint Filed: June 24, 2024
FAC Filed: February 26, 2026

DECLARATION OF CONOR J. DALE

I, Conor J. Dale, declare:

1. I am an attorney at law duly licensed to practice law in the State of California and before this court. I am a Partner at Jackson Lewis P.C. , attorneys of record for Defendants Fabletics, LLC, Techstyle, Inc. and Adam Goldenberg (collectively, "Defendants").

2. I make this declaration in support of the Motion for Preliminary Approval of Class Action Settlement in *E. Damiano v. Fabletics, LLC, et al.*, LASC Case No. 24STCV15783. I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

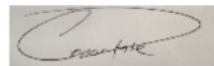
3. Through internal investigation, I have determined that neither my firm nor Defendants have an interest or involvement in the governance or work of the settlement administrator, Phoenix Settlement Administrators. Neither my firm nor Defendants are aware of any facts relevant to any actual or potential conflicts of interest between my firm or Defendants, with Phoenix Settlement Administrators.

4. Other than this action, I am not aware of any other pending action asserting claims that will be extinguished or adversely affected by the settlement agreement in this action.

5. Counsel for the Parties agreed that there was no need for a Spanish language translation of the Notice to the settlement based on the lack of any evidence that any members of the settlement class are primarily Spanish speaking and the fact that crew members on the productions at issue were expected to read and speak English.

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

Executed March 20, 2026, at San Francisco, California.



Conor J. Dale

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PROOF OF SERVICE

I am an attorney for Plaintiff in the within action, over the age of eighteen years, and not a party to the within action. My business address is Harris & Ruble, 655 North Central Avenue, 17th Floor, Glendale, California 91203. On March 27, 2026, I served the within documents:

DECLARATION OF CONOR J. DALE IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Electronic Service: I caused the above-entitled document(s) to be served through Case Anywhere addressed to all parties appearing on the electronic service list for the above-entitled case and on the interested parties in this case:

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I declare under penalty of perjury that the above is true and correct. Executed on March 27, 2026, at Los Angeles, California.



Priya Mohan