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Attorneys for Defendant
HYDRO-AIRE AEROSPACE, CORP.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

JORGE PALATO, as an individual and on behalf
of all others similarly situated,

Plaintiff,

v.

HYDRO-AIRE AEROSPACE, CORP., a
California Corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 24STCV19936

**DECLARATION OF ROBERT S.
BLUMBERG IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL**

ASSIGNED FOR ALL PURPOSES TO
JUDGE CAROLYN KUHL, DEPT. 12

Date: September 10, 2025
Time: 10:30 a.m.
Dept: SSC-12

Trial Date: Not Set
Complaint Filed: August 7, 2024

DECLARATION OF ROBERT S. BLUMBERG

I, Robert S. Blumberg, declare and state:

1. I am a Shareholder with the law firm of Littler Mendelson, P.C., and counsel of record for Defendant Hydro-Aire Aerospace Corp. ("Defendant") in the above-captioned action. I am licensed to practice law in the State of California and appear in the above-captioned matter. All of the information set forth herein is based upon my personal and knowledge, unless alleged upon information and belief, and if called and sworn as a witness, I could and would competently testify hereto.

2. I am submitting this Declaration in support of the Motion for Preliminary Approval of settlement between Plaintiff Jorge Palato (“Plaintiff”) and Defendant.

3. Neither I nor my firm has an interest or relationship, financial or otherwise, with the proposed administrator Phoenix Settlement Administrators other than a professional relationship arising out of prior experiences administering settlements.

4. I am informed and believe that there are no other pending legal matters which will be extinguished or adversely affected by the settlement of this matter.

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

Executed this 11th day of June 2025, at Los Angeles, California.


ROBERT S. BLUMBERG

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