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Attorneys for Defendant
MERCURY INSURANCE SERVICES, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

FIDEL ANTONIO MUNOZ,
DOUGLASS OLMSTED, and ANDREW
DAT, on behalf of themselves and all
others similarly situated and in their
capacities as private attorneys general,

Plaintiffs,

v.

MERCURY INSURANCE SERVICES,
LLC, a California limited liability
company; and DOES 1 through 50,
Inclusive,

Defendant.

Case No.: 24STCV08298

Assigned for All Purposes to:
Hon. Carolyn B. Kuhl, Dept. 12

**DECLARATION OF BLAKE R.
BERTAGNA IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL**

Complaint Filed: March 29, 2024

Trial Date: None Set

DECLARATION OF BLAKE R. BERTAGNA

I, Blake R. Bertagna, declare:

1. I am an attorney at law duly licensed to practice before all of the California state courts. I am Of Counsel in the law firm of Paul Hastings LLP and am lead counsel for defendant Mercury Insurance Services, LLC (“Defendant”) in this action. I have personal knowledge of the matters set forth herein, and, if called upon to do so, I could and would testify competently to them. I submit this declaration in support of plaintiff’s unopposed motion for preliminary approval of the class action settlement.

2. I am not aware of any facts giving rise to any actual or potential conflicts of interest that would preclude the appointment of Phoenix Settlement Administrators as the settlement administrator in this matter. Specifically, Defendant, nor the individual attorneys representing Defendant, has an interest in or involvement with Phoenix Settlement Administrators.

3. The agreed-upon recipient of the cy pres award in this settlement, Inclusion Matters by Shane’s Inspiration, is a 501(c)(3) non-profit organization that advocates for disabled children. Its mission is to create social inclusion for children with disabilities through the creation of inclusive playgrounds and programs that unite children of all abilities and ultimately foster a bias-free world for children with disabilities. Inclusion Matters by Shane’s Inspiration also inspires and empowers teachers to make their school communities more inclusive through professional development trainings.

4. Neither Defendant, nor individual attorneys representing Defendant, has an interest in or involvement with Inclusion Matters by Shane’s Inspiration. A member of my global law firm, Paul Hastings LLP, provides volunteer service as a member of the Board of

1 Directors of Inclusion Matters by Shane's Inspiration, but that individual had no involvement in
2 this action.

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

6 Executed on November 21, 2024, at Costa Mesa, California.

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11 Blake R. Bertagna
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