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BLACKSTONE CONSULTING, INC.
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9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 PENNY A. SCOTT, on behalf of herself
and other similarly-situated employees,

12 Plaintiff,

13 vs.

14 BLACKSTONE CONSULTING, INC.,
a California Corporation; and DOES 1
15 Through 10, inclusive,

16 Defendants.
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Case No. 21-cv-1470- MMA-KSC

**DECLARATION OF PANKIT J.
DOSHI IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL
HEARING**

Date: July 10, 2023
Time: 2:30 p.m.
Judge: Michael M. Anello
Ctm.: 3D (3rd Floor)

Complaint Filed: May 21, 2021 First
Amended Complaint: July 21, 2021

1 I, PANKIT J. DOSHI, hereby declare the following:

2 1. I am an attorney duly licensed and admitted to practice before this Court.
3 I am a partner at the law firm McDermott Will & Emery LLP, counsel of record for
4 Defendant Blackstone Consulting, Inc. (“Defendant” or “BCI”) in the above-titled
5 action. I make this declaration in support of Plaintiffs PENNY A. SCOTT; AHMIR
6 RINGO; TIFFANY LOCKETT; TOCASHEMA WILLIAMS; and KAWANA
7 ANDERSON’S (“Plaintiffs”) Motion for Preliminary Approval Hearing. I have
8 personal knowledge of the facts set forth herein, which are known by me to be true
9 and correct, and if called as a witness, I could and would competently testify hereto.

10 2. Plaintiffs and Defendant BCI (collectively, the “Parties”) discussed
11 multiple related class actions and PAGA actions that were filed against Defendant,
12 and which raise related claims. These cases were (1) *Penny Scott v. Blackstone*
13 *Consulting, Inc.*, Case No. 21-cv-1470-MMA-KSC, filed in the United States
14 District Court for the Southern District of California; (2) *Ahmir Ringo v. Blackstone*
15 *Consulting, Inc.*, Case No. 22SMCV00066, filed in the Superior Court of Los
16 Angeles; (3) *Tiffany Lockett and Tocashema Williams v. Blackstone Consulting,*
17 *Inc.*, Case No. CVRI2201443, filed in the Superior Court of Riverside; (4) *Kawana*
18 *Anderson v. Blackstone Consulting, Inc.* (PAGA action), Case No. 22SMCV01667,
19 filed in the Superior Court of Los Angeles; and (5) *Kawana Anderson v. Blackstone*
20 *Consulting, Inc.* (Class action), Case No. 22SMCV31450, filed in the Superior Court
21 of Los Angeles (this action and all related class and PAGA actions against BCI
22 collectively referred to as the “BCI Wage and Hour Actions”).

23 3. The Parties mediated the BCI Wage and Hour Actions on December 1,
24 2022, and executed a formal Settlement Agreement on April 5, 2023.

25 4. As part of the Settlement Agreement, the Parties agreed to appoint CPT
26 Group as the Settlement Administrator, and Legal Aid at Work as the Cy Pres
27 Recipient.

28 5. Defendant is not aware of any actual or potential conflicts of interest

1 between any of the Parties and CPT Group, the Settlement Administrator proposed
2 by the Parties, in this matter.

3 6. Defendant is not aware of any actual or potential conflicts of interest
4 between any of the Parties and Legal Aid at Work, the Cy Pres Recipient proposed
5 by the Parties, in this matter.

6 7. McDermott Will & Emery LLP (“MWE”)—counsel of record for
7 Defendant—and its attorneys assigned to represent Defendant in this matter are not
8 aware of any actual or potential conflicts of interest between any of the Parties and
9 Legal Aid at Work, the Cy Pres Recipient proposed by the Parties, in this matter.

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11 I declare under the penalty of perjury under the laws of the United States of
12 America that the foregoing is true and correct, and executed on May 11, 2023, in
13 San Francisco, California.

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16 PANKIT J. DOSHI