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20 Attorneys for Plaintiffs Eric Gruber, Ever Gonzalez, Jeremy
21 Earls and Certified Class

22 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
23 **COUNTY OF SAN FRANCISCO**

24 ERIC GRUBER; EVER GONZALEZ; and
25 JEREMY EARLS, individually and on behalf
26 and all others similarly situated,

27 Plaintiffs,

28 v.

YELP, INC., and DOES 1-10, inclusive,

Defendants.

Case No. CGC 16-554784

CLASS ACTION

**DECLARATION OF ZAREH A.
JALTOROSSIAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS SETTLEMENT
and ATTORNEY FEES and COSTS**

Date: April 10, 2024

Time: 9:30

Dept.: 613

Action Filed: October 12, 2016

Assigned to the Hon. Andrew Y.S. Cheng

ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

03/15/2024
Clerk of the Court
BY: SANDRA SCHIRO
Deputy Clerk

1 **DECLARATION OF ZAREH A. JALTROSSIAN**

2 I, Zareh A. Jaltrossian, declare:

3 1. I am an attorney at law duly licensed to practice before all of the courts in the State of
4 California, the Ninth Circuit Court of Appeals, the United States Supreme Court, and United States
5 Court of Appeals for the Federal Circuit. I am a principal with the law firm of KP Law, counsel of
6 record for Plaintiffs Eric Gruber, Jeremy Earls, Ever Gonzalez, and the certified class in this Lawsuit,
7 together with the co-counsel firms Jaurigue Law Group and Da Vega Fisher Mechtenberg, LLP
8 (“DFM LLP”) (collectively “Class Counsel”). I submit this declaration in support of Plaintiffs’
9 Motion for Final Approval of Class Settlement and Attorney Fees and Costs. This declaration is based
10 on my personal knowledge and, if called as a witness, I would competently testify to the contents
11 herein.

12
13 **COUNSEL BACKGROUND AND QUALIFICATIONS**

14 2. My professional qualifications are as follows. After graduating from UCLA in 1996
15 with bachelor’s degrees in philosophy and political science, I attended the UCLA School of Law,
16 graduating in 1999. During law school, I externed for the Honorable Dean D. Pregerson of the United
17 States District Court, Central District of California, and for the Honorable Harry Pregerson of the
18 Ninth Circuit Court of Appeals. From 1999 to January 2006, I was an associate at Sheppard Mullin
19 Richter & Hampton, LLP, where I practiced commercial litigation. From 2006 to 2016, I was an
20 associate and then Counsel at Reed Smith LLP, where I was a member of the appellate group. In
21 2013, I was certified as a Specialist in Appellate Law by the California State Bar. From May 2016 to
22 January 2018, I was Senior Counsel at Ballard Rosenberg Golper & Savitt, where I handled all of that
23 firm’s appellate work. I joined Dakessian Law, Ltd. in February 2018 as Appellate Counsel, where I
24 handled the firm’s appellate work. In September 2019, I joined KP Law in Pasadena, California,
25 where I am a principal. KP Law is a two-attorney litigation firm specializing in appellate and civil
26 litigation on behalf of consumers and persons who have suffered personal injuries. My practice
27 consists mostly of appellate work as well as brief writing on complex motions in the trial court.

1 Attached hereto as Exhibit A is a true and correct copy of my biography and representative matters,
2 including scholarly writing on appellate and other issues as well as a number of appellate decisions.

3 3. In the course of my 25-year career, I have argued approximately 40 appeals in the
4 California Court of Appeal, the Ninth Circuit Court of Appeals, the Ninth Circuit's Bankruptcy
5 Appellate Panel, and the Appellate Division of the California Superior Court. I have also taken a lead
6 brief-writing role in more than 120 appeals and petitions for writ of mandate, both in the state and
7 federal appellate systems and across several jurisdictions. In addition, I have prepared briefs in the
8 California Supreme Court and the United States Supreme Court (at certiorari stage). As a litigator, I
9 have prepared and argued countless dispositive and other motions and managed a variety of complex
10 cases through trial and arbitration. My practice has spanned across several substantive areas of law,
11 including personal injury, shareholder derivative litigation, commercial real estate, environmental
12 litigation, consumer class actions, and employment law.

13 4. My co-counsel's background is described in the declarations of my co-counsel,
14 Mathew H. Fisher and Michael Jaurigue. Mr. Fisher's declaration also addresses the reasonableness
15 of the requested fees in relation to the contingency fee market and comparable class action litigation.
16 For reasons of efficiency, I will not address those issues in my declaration, and I incorporate Mr.
17 Fisher's statements and analysis herein. Rather, my declaration describes the work I performed on
18 this matter and explains the justification for the fees and costs incurred by KP Law and Dakessian
19 Law, where I was employed when I was initially retained on this matter, as described in more detail
20 below.

21
22 **DESCRIPTION OF SERVICES RENDERED TO PLAINTIFFS AND THE CLASS BY**
23 **DAKESSIAN LAW AND KP LAW**

24 5. I began working on this matter while I was employed at Dakessian Law. Specifically,
25 Dakessian Law and I were associated in as co-counsel by Mr. Gruber in June 2018 in order to handle
26 the appeal from the trial court's summary judgment in favor of Defendant Yelp. The appeal was filed
27 on August 17, 2018. My work at Dakessian Law on this matter consisted of filing the notice of appeal
28

1 and related procedural documents for the appeal (like the notice designating the record and preparation
2 of the civil case information statement), review of the extensive trial court record and pleadings,
3 supervising the preparation of the appellate record, preparation of the opening and reply briefs on
4 appeal, analysis of three amicus curiae briefs filed in the Court of Appeal in support of Yelp’s position,
5 and the preparation of a brief in response to the amicus briefs. In addition, I spent significant time
6 conferring with my co-counsel on strategy issues and developing the arguments on appeal, researching
7 the law, and analyzing the legislative history of the relevant Penal Code statutes. While I was
8 employed at Dakessian Law, my work on this matter continued through August/September 2019. I
9 kept contemporaneous records of my time. The total time I spent on this matter while at Dakessian
10 Law is 257.5 hours.

11 6. I continued to work on this matter after I joined KP Law in September 2019. Oral
12 argument was held on September 30, 2020. While at KP Law, I prepared for and presented oral
13 argument in the Court of Appeal. The Court of Appeal issued its decision on October 7, 2020. The
14 Court of Appeal reversed the summary judgment and held, in a published decision, that “one way”
15 recording of telephone communications without notice constitutes a violation of Penal Code section
16 632.7. On October 20, 2020, Yelp filed a petition for rehearing. On October 23, 2020, the Court of
17 Appeal denied the petition for rehearing, with a modification to the opinion. Yelp then changed
18 counsel, hiring Reed Smith. In November 2020, Yelp filed a petition for review with the California
19 Supreme Court. I prepared the answer to the petition for review. Yelp filed a reply. The petition was
20 denied in January 2021.

21 7. After the Court of Appeal issued the remittitur transferring this matter to this Court, my
22 role representing the putative class expanded to trial court litigation as well as appellate work.
23 Specifically, in February 2022, Yelp filed a petition for writ of mandate challenging this Court’s ruling
24 directing *Belaire* notice to class members (*Belaire-West Landscape v. Superior Court*, 149
25 Cal.App.4th 554 (2007)). I prepared a preliminary opposition to Yelp’s writ petition. However, on
26 March 7, 2022, the day we were preparing to file the opposition, the Court of Appeal summarily denied
27 Yelp’s writ petition. Thereafter, I worked with my co-counsel on numerous trial court tasks, including
28

1 discovery issues, *ex parte* applications, two mediation briefs, opposing Yelp’s renewed motion for
2 summary adjudication, preparing the class certification motion, and opposing Yelp’s three motions to
3 exclude Plaintiffs’ experts in connection with the class certification proceedings. I was heavily
4 involved in drafting and revising all major trial court briefs. My appellate expertise, however,
5 continued to be needed. In February 2023, Yelp filed a petition for writ of mandate challenging this
6 Court’s order granting class certification, supported by an 8-volume appendix consisting of almost
7 5,000 pages. After the Court of Appeal requested an opposition to the petition, I spent substantial time
8 preparing that brief. Yelp’s petition was also supported by an amicus brief. I prepared the responsive
9 brief to that brief as well. In late March 2023, Yelp filed an extensive reply brief. On May 24, 2023,
10 the Court of Appeal denied Yelp’s petition. In June 2023, Yelp filed a second petition for review in
11 this case to the California Supreme Court. I prepared the answer to the petition, and Yelp filed a reply.
12 (Ultimately, Yelp withdrew that petition after the parties reached a settlement following mediation in
13 July 2023). Thereafter, I spent substantial time assisting my co-counsel in finalizing the settlement
14 agreement, preparing the motion for preliminary approval, and later on preparing supplemental
15 briefing to this Court addressing the Court’s concerns regarding the settlement. At KP Law, I also
16 kept contemporaneous time records of my work on this case. Based on my review of my records,
17 while at KP Law I have to date devoted approximately 715 hours to this matter.

18 8. I submit this declaration in support of the fees and costs incurred by both KP Law and
19 Dakessian Law. After I left Dakessian Law and joined KP Law, KP Law associated in as counsel and
20 I continued to represent Plaintiff. KP Law and Dakessian Law agreed to split fees 2/3 and 1/3,
21 respectively, in order to fairly compensate Dakessian Law for the work I performed while employed
22 at that firm. We also agreed to split the costs 2/3 and 1/3. KP Law’s costs to date are \$13,087.06,
23 consisting of court costs, expert witness fees, mediation fees, administrative internal costs, and costs
24 associated with several trips to San Francisco for court hearings. Dakessian Law’s costs are
25 \$23,049.37. Combined, KP Law and Dakessian Law have incurred a total of \$36,136.42 in costs,
26 broken down as follows:

27 **Filings/Service/Depos/Court Fees:** \$ 6,429.87

1	Travel (Flights, Lodging, Rentals, Meal):	\$	3,556.25
2	Mediation Fees/Costs:	\$	6,979.20
3	<u>Experts Fees/Costs:</u>	\$	19,171.10
4	TOTAL COSTS		\$ 36,136.42

5 The total hours devoted to this matter by both firms thus far is 972.5.

6 9. My hourly rate on this matter, both at Dakessian Law and KP Law, has been \$750.
7 Based on my 25 years of experience at established firms, I can attest that the hourly rate of \$750 for
8 my time on this case is reasonable and consistent with what other firms would charge for my time for
9 attorneys of comparable skill and experience. Mr. Fisher's declaration attaches evidence reflecting
10 the hourly rates charged by lawyers of comparable skill and experience in California. Those rates are
11 consistent with my personal experience of rates charged by attorneys with backgrounds and
12 qualifications similar to mine. Based on my experience, I have found it is common for certified
13 appellate specialists at large firms, where I practiced for 17 years, to charge rates far higher than the
14 \$750 for my time on this case.

15 10. With the work I estimate is remaining in the case, the combined lodestar of KP Law
16 and Dakessian Law will approach or exceed 1,000 hours. When calculated based on the hourly rates
17 of each firm as described in Mr. Fisher's declaration, the requested fee is reasonable given the risk
18 undertaken by KP Law and Dakessian Law in representing the class. For KP Law and Dakessian Law
19 to recover any fees in this matter, Plaintiffs had to succeed in their initial appeal from the adverse
20 summary judgment ruling. Plaintiffs then had to overcome Yelp's efforts to seek review with the
21 California Supreme Court, conduct extensive discovery and retain multiple experts in order to obtain
22 class certification, defeat Yelp's efforts to appeal that ruling, and oppose Yelp's motion for summary
23 adjudication. Although there were multiple appellate proceedings in this case, the reality is that from
24 both an appellate and trial court perspective, this was an extraordinarily difficult and complex class
25 action. Yelp contested Plaintiffs' allegations vigorously, raising complicated and creative legal
26 arguments that spanned the gamut from attacking the qualifications and methodology of Plaintiffs'
27 experts to novel First Amendment and Due Process defenses. For this reason, the briefing work I

1 performed on this case both in the appellate and trial courts was unusually taxing and time consuming,
2 requiring many hours of research and analysis of case law and a high level of appellate and litigation
3 expertise and experience. Plaintiffs and class counsel had to overcome multiple, potentially case
4 dispositive hurdles in order to achieve the settlement in July 2023. The novel and untested nature of
5 the one-way recording theory Plaintiffs advanced enhanced the risks normally associated with class
6 actions. Beyond the contingent risk, KP Law and Dakessian Law (along with co-counsel) have been
7 subjected to a long delay in payment. KP Law and Dakessian Law have been putting significant time
8 into this case since 2018, and therefore the 6 or more years in delay in payment also strongly supports
9 the reasonableness of the requested fees. Co-counsel JLG and DVFM have experienced even greater
10 delay.

11
12 I declare under penalty of perjury under the laws of the State of California that the foregoing
13 is true and correct. Executed on March 15, 2024 at Pasadena, California.

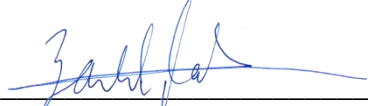
14
15 
16 _____
Zareh A. Jaltorossian

EXHIBIT A

Zareh Jaltorossian

Appellate Specialist And Seasoned Business Litigator

Attorney Zareh Jaltorossian is certified as a Specialist in Appellate Law by the California State Bar Board of Legal Specialization. He is also a seasoned business litigator with more than 20 years of experience working closely with companies and corporations of all sizes.

Zareh's appellate practice focuses on [appeals](#) and interlocutory writs in state and federal courts. He has handled and argued numerous appeals across a broad range of substantive areas, including state tax, product liability, employment, business litigation, commercial real estate, health/managed care litigation, and consumer class actions. Additionally, Attorney Jaltorossian works closely with trial attorneys at all stages of litigation to advise them regarding record preservation issues and to assist with the preparation of complex motions, including dispositive and post-trial motions, all with the goal of maximizing the chances of success on appeal.

Our law firm and our clients can also call upon Zareh for his broad and deep experience as a business litigator. He has personally litigated lawsuits involving partnerships, commercial real estate conflicts, employment matters, and consumer class actions, building a history of success.

Big Firm Power With Small Firm Accessibility And Personalized Customer Service

After attending UCLA and UCLA Law School, Zareh spent the vast majority of his career at two prestigious, global law firms. For every case he accepts, Zareh brings "big firm" experience and insight while also providing our clients the benefits of "small firm" representation, like competitive hourly rates and a personalized approach to casework.

Externships With Federal Court Judges

To round out his legal career, Attorney Jaltorossian has extern for Judge Harry Pregerson of the United States Court of Appeals for the Ninth Circuit and United States District Court Judge Dean Pregerson. Furthermore, he has published extensively on developments in appellate and other areas of law. He has also spoken and lectured frequently on appellate issues for a wide variety of audiences, including trial attorneys.

Education

- The University of California, Los Angeles School of Law, JD, 1999
- University of California, Los Angeles, BA, Philosophy and Political Science, 1996
 - *Summa Cum Laude, Phi Beta Kappa*

Professional Experience

- The Honorable Harry Pregerson, Judicial Extern, U.S. Court of Appeals, Ninth Circuit (Fall 1998)
- The Honorable Dean Pregerson, Judicial Extern, U.S. District Court, Central District of California (Summer 1997)

Published Articles

- For Whom The Death Knell Doctrine Tolls In State Courts, *Los Angeles Daily Journal* (August 2016)
- 9th Circuit Joins 7th In Striking Class Action Waivers, *Los Angeles Daily Journal* (September 2016)
- California Supreme Court To Decide Borrowers' Standing to Challenge Mortgage Loan Assignments, *ABTL Report, Vol. XXXIV, No. 4* (Fall 2015/Winter 2016)
- Are You Sure That Final Judgment Is Final? *Los Angeles Daily Journal* (March 2012)
- Navigating The Shores Of Invited Error, *Los Angeles Daily Journal* (March 2012)
- "Denial of Class Certification: Preserving to Right to Appeal," *Los Angeles Daily Journal*, (February 16, 2010)
- "An Appealing Approach to Deadline Filing," *Daily Journal*, (October 6, 2008)
- "Appellate Practice, Ground Rules," *Los Angeles Daily Journal*, (February 15, 2008)
- "Objections to Evidence," *Los Angeles Daily Journal*, (November 29, 2007)
- "Strict Compliance," *Los Angeles Daily Journal*, (May 1, 2007)
- "Losing Summary Judgments," *Los Angeles Daily Journal*, (December 14, 2006)
- "The Dynamics of Appellate Oral Argument," *Certworthy*, (Summer 2006)
- "Three Reasons for Thinking Twice Before Filing a Frivolous Appeal," *Orange County Lawyer*, (April 2006)

Associations & Certifications

- Certified as a Specialist in appellate law by State Bar of California
- LACBA, Appellate Courts Section, member
- State Bar of California (1999), United States District Court and United States Court of Appeals, Ninth Circuit, and United States Supreme Court

Published & Noteworthy Cases

- *A.R.D. Service, Inc. v. Freidin*, 2023 Cal. App. Unpub. LEXIS 678 (B318218, Feb. 1, 2023): Won affirmance of order denying motion to vacate default judgment in action alleging breach of commercial lease agreement.
- *Hudson v. Tatevossian*, 2023 Cal. App. Unpub. LEXIS 473 (B317487, Jan. 23, 2023): Won reversal of summary judgment in medical malpractice action.
- *Tadevosyan v. Superior Court*, 2022 Cal. App. Unpub. LEXIS 7577 (B319714, Dec. 9, 2022): Won writ petition reversing ruling vacating lis pendens in action alleging breach of contract for sale of real property.

- *Nosrati v. Cronen*, 2022 Cal. App. Unpub. LEXIS 6234 (B315738, Oct. 13, 2022): Won reversal of post-judgment order denying prejudgment interest in action alleging breach of contract for sale of real property.
- *Chen v. Herschel*, 2022 Cal. App. Unpub. LEXIS 1266 (B306200, Mar. 2, 2022): Won affirmance of \$18 million judgment for compensatory and punitive damages after jury verdict in action alleging negligence and intentional infliction of emotional distress from hit and car resulting in death of plaintiff's mother.
- *Weisberg v. Jaurigue Law Group*, 2022 Cal. App. Unpub. LEXIS 4943 (B309754, Aug. 11, 2022): Won affirmance of order granting anti-SLAPP motion in action alleging various tort claims arising from purported failure to honor attorney fee lien.
- *Dua v. Dordulian*, 2021 Cal. App. Unpub. LEXIS 4424 (B303302, Jul. 7, 2021): Won affirmance of order granting SLAPP motion dismissing plaintiff's complaint in action for malicious prosecution and abuse of process.
- *Shui v. B.R. & Sons*, 2021 Cal. App. Unpub. LEXIS 1226 (Feb. 21, 2021): Won full affirmance of jury verdict of \$5.3 million in case involving injuries to plaintiff's leg caused by vehicle collision.
- *Gruber v. Yelp, Inc.* ____ Cal.App.5th ____, 2020 Cal. App. LEXIS 938 (2020): In class action, won published decision reversing summary judgment in case alleging violations of California Invasion of Privacy Act (CIPA), Penal Code sections 632 and 632.7. Holding: (1) Non-consensual recording of communications during telephone calls violates CIPA even when the plaintiff's own voice is not recorded; and (2) CIPA prohibits the use of Voice Over Internet Protocol (VOIP) to carry out non-consensual recording of communications during telephone calls.
- *Huezo v. Ball (In re Huezo)*, 2020 Bankr. LEXIS 1947 (9th Cir. BAP 2020): Won affirmance in Ninth Circuit Bankruptcy Appellate Panel on both liability and damages issues of judgment for nondischargeability of debt, fraud and willful and malicious injury.
- *Kiosea v. Ohannessian* (California Court of Appeal, Second Appellate District) (2020): Obtained order dismissing entire appeal as untimely.
- *Green Farms, Inc. v. City of Los Angeles* (2018/2019): First chaired bench trial resulting in judgment invalidating City of Los Angeles' improper classification of wholesale and retail business for purposes of the LA business tax. Prevailed in post-judgment motion for attorney fees under Code of Civil Procedure section 1021.5
- *Francisco v. Alameda-Contra Costa Transit District* (2018): Affirmance of jury verdict of \$15.3 million in personal injury action
- *AHMC Healthcare, Inc. v. Superior Court*, 24 Cal.App.5th 1014 (2018): Writ of mandate reversing denial of summary adjudication in wage and hour case
- *Greene v. True Crime, LLC*, 2016 WL 930942 (2016): Affirmance of order denying anti-SLAPP motion
- *Horton v. Endocare, Inc.*, 2016 WL 6311640 (2016): Affirmance in Court of Appeal of order granting summary judgment in action alleging bodily injuries arising from defective medical device
- *Health Net of California v. Superior Court* (2016): Order to show cause after writ of mandate petition reversing order compelling production of documents protected by right of privacy.

- *Bank of New York Mellon v. Superior Court* (2015): Writ of mandate reversing order denying summary judgment motion with directions to grant motion
- *Cutler v. Franchise Tax Board*, 229 Cal.4th 419 (2014): Reversal of order denying motion for attorney fees under attorney general statute
- *Cutler v. Franchise Tax Board*, 208 Cal.App.4th 1247 (2012): Reversal of order denying summary judgment motion. The Court of Appeal held a state tax provision providing tax benefits for sale of stocks in a qualified California small business was unconstitutional under dormant Commerce Clause
- *Perez v. Torres*, 206 Cal.App.4th 418 (2012): Code of Civil Procedure section 998 offer to compromise is invalid where it fails to include a statutorily required acceptance provision
- *Landeros v. Torres*, 206 Cal.App.4th 398 (2012): Affirmance of jury verdict in excess of \$30 million. The Court of Appeal held that Civil Code section 3333.4 does not preclude recovery of noneconomic damages against a drunk driver where plaintiff is an unlicensed permissive user of an insured vehicle
- *Kompany v. Israyelyan*, 2010 WL 450401 (2010): Reversal of unlawful detainer judgment against tenant after bench trial for possession, past-due rent, damages and attorney fees.
- *321 Henderson Receivables Origination LLC v. Sioteco, et al.*, 173 Cal.App.4th 1059 (2009): Reversed consolidated superior court order denying 11 petitions for approval of the transfer of structured settlement payments rights. The Fifth District Court of Appeal held that contractual anti-assignment provisions are generally ineffective in barring transfers of structured settlement payment rights
- *Mintz v. Blue Cross*, 172 Cal.App.4th 1594 (2009): Dismissal of claims for intentional interference with contractual relations, negligent interference with contractual relations, and intentional infliction of emotional distress arising out of alleged wrongful denial of health insurance benefits
- *Watkins v. Wachovia Corp.*, 172 Cal.App.4th 1576 (2009): In class action alleging violation of wage and hour laws, obtained dismissal of appeal from order denying class certification
- *Bidari v. Kelk.*, 90 Cal. App. 5th 1152 (2023): Won affirmance in published opinion of dismissal after order granting judgment on the pleadings in action for malicious prosecution.
- *Longobardo v. Avco.*, 93 Cal.App.5th 529 (2023): Won dismissal in published opinion of appeal on ground that challenged order was not appealable.
- *It's My Seat v. Woodley et al.*, 2023 U.S. App. LEXIS 26325 (9th Cir. 2023): In case alleging violations of RICO and commission of fraud arising from commercial loan transaction, won reversal of order dismissing plaintiff's action for alleged violations of court orders and claim splitting.

2 **PROOF OF SERVICE**

3 I am employed in the County of Los Angeles; I am over the age of eighteen years and am not a
 4 party to the within action; and my business address is 300 West Glenoaks Boulevard, Suite 300,
 Glendale, California 91202.

5 On **March 15, 2024**, I served the document(s) described as

6 **DECLARATION OF ZAREH A. JALTOROSSIAN ISO MOTION FOR FINAL**
 7 **APPROVAL**

8 on the party (or parties) in this action by delivering a true copy (or copies) addressed as follows:

<p>9 Brian A. Sutherland 10 Christine M. Morgan 11 Chris J. Pulido REED SMITH LLP 12 101 Second Street, Ste 1800 San Francisco, CA 94105 BSutherland@ReedSmith.com CMorgan@ReedSmith.com CPulido@ReedSmith.com QLa@reedsmith.com CMosqueda@ReedSmith.com 15 <i>Attorney(s) for Defendant Yelp,</i> 16 <i>Inc.</i></p>	<p>Matthew S. Da Vega Matthew H. Fisher DA VEGA FISHER MECHTENBERG LLP 232 East Anapamu Street Santa Barbara, CA 93101 mfisher@mdmflaw.com mdavega@mdmflaw.com <i>Attorney(s) For Plaintiff</i> <i>Eric Gruber</i></p>	<p>Zareh A. Jaltorossian KP LAW 150 East Colorado Blvd. Suite 206 Pasadena, CA 91105 zjaltorossian@kplitigators.com <i>Attorney For Plaintiff</i> <i>Eric Gruber</i></p>
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 18 **XXX BY ELECTRONIC MAIL:** I caused to be served by electronic transmission (e-mail) to
 19 the parties and/or their attorney(s) of record stated above. The document(s) was/were
 20 transmitted by electronic transmission. The transmission was reported as complete and
 without error.

21 I declare under penalty of perjury under the laws of the State of California and the United States
 22 that the foregoing is true and correct. Executed on **March 15, 2024** at Glendale, California.

23
 24 

25 Parker Swanson