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16 **IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
17 **IN AND FOR THE COUNTY OF FRESNO**

18 MANMOHAN DHILLON, dba RANCHOS
19 VALERO, SATNAM PABLA, dba GMG
20 FOOD STORE 101 and MADERA AVE.
21 MARKET, SERGE HAITAYAN, dba 7-11
22 NUMBER 17906b, DALJIT SINGH, dba
23 LIQUOR MAX, and PAR VENTURES, LLC,
24 dba, QUICK PICK, on Their Own Behalves
25 and on Behalf of All Others Similarly Situated
26 and on Behalf of the General Public,

27 Plaintiffs,

28 v.

ANHEUSER-BUSCH, LLC, DONAGHY
SALES, LLC, a California Corporation;
ANHEUSER-BUSCH DOES 1-5 and DOES
6 through 50, inclusive,

Defendants.

CASE NO. 14CECG03039 JMS

**DECLARATION OF JOSEPH
GOLDBERG IN SUPPORT OF
PLANTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND EXPENSES
ON BEHALF OF FREEDMAN BOYD
HOLLANDER & GOLDBERG P.A.**

JUDGE: Honorable Jon M. Skiles

DATE: TBD

TIME: TBD

DEPT: 403

1 I, JOSEPH GOLDBERG, declare as follows:

2 1. I am a lawyer licensed to practice in the state courts of New Mexico and
3 Connecticut, and in various federal courts throughout the country. I have also been admitted pro
4 hac vice to appear in the California state courts for purposes of this case. I have been a lawyer for
5 more than 55 years.

6 2. I and my law firm, Freedman Boyd Hollander & Goldberg P.A., have represented
7 the plaintiffs in this matter since its inception. During that period of time, I and my law firm have
8 been extensively involved in all aspects of this litigation, including direction and strategy of
9 presenting plaintiffs' claims, drafting of pleadings and arguments in the various courts,
10 management of discovery, including written discovery and depositions, expert work in the case,
11 and mediations and negotiations that resulted ultimately in the settlement agreement now before
12 the Court. A resume of my firm is attached as Exhibit C to the previously filed Declaration of
13 Dennis Stewart In support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class
14 Action Settlement dated November 14, 2023.

15 3. During my firm's representation of plaintiffs in this case, the lawyers, paralegals
16 and law clerks in my firm who worked on this case expended 6,092.53 hours, representing a total
17 lodestar of \$1,705,119.45, calculated at the firm's historical hourly rates. This lodestar
18 calculation is calculated from the case inception. The hourly rates employed in this calculation
19 are the same hourly rates we charge to clients who pay for our services by the hour. The times
20 and charges were recorded contemporaneously with the provision of services. Regularly during
21 this period, and in addition, in preparation for this submission, I reviewed the time entries of all
22 billers in this case to eliminate or reduce unnecessary, redundant or unreasonable charges. The
23 summary of my firm's lodestar in this case, as reduced by me, is attached as Exhibit A to this
24 Declaration.

25 4. None of the time incurred in the preparation of this Motion for an Award of
26 Attorneys' Fees and Expenses is reflected in the lodestar reported herein.
27
28

1 5. During my firm's representation of plaintiffs in this case, my firm incurred
2 expenses reasonable and necessary to the prosecution of plaintiffs' claims. The total amount of
3 those necessary expenditures for which my firm seeks reimbursement is \$277,948.00. These
4 expenses were calculated from the case inception. Each of those expenditures was reasonable
5 and necessary and was recorded contemporaneously with the expenditure, employing my firm's
6 financial control systems. Regularly during this period, and in addition, in preparation for this
7 submission, I reviewed every entry of costs incurred to assure that it was appropriately assigned
8 to this case and was correct. A summary of the expenditures for which my firm seeks
9 reimbursement is attached as Exhibit B to this Declaration.

10 I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th
11 day of April 2024, at Albuquerque New Mexico.

12
13 
14
15 JOSEPH GOLDBERG

**MANMOHAN DHILLON, et al. v. Anheuser-Busch, LLC et al.,
Case No. 14CECG03039 JMS**

Exhibit A - TIME REPORT

FIRM NAME: Freedman Boyd Hollander & Goldberg PA

Reporting Period: Inception through 05/22/2023

PROFESSIONAL	TITLE	CUMULATIVE HOURS	HISTORIC HOURLY RATE	CUMULATIVE LODESTAR*
David A. Freedman	(P)	4.50	\$450.00	\$2,025.00
John W. Boyd	(P)	46.90	\$425.00	\$19,932.50
John W. Boyd	(P)	60.05	\$450.00	\$27,022.50
Joseph Goldberg	(P)	340.75	\$425.00	\$144,818.75
Joseph Goldberg	(P)	820.35	\$450.00	\$369,157.50
Joseph Goldberg	(P)	531.25	\$500.00	\$265,625.00
Joseph Goldberg	(P)	59.75	\$650.00	\$38,837.50
Carolyn E. Kennedy	(PL)	12.00	\$100.00	\$1,200.00
Deborah R. Tope	(SPL)	742.92	\$100.00	\$74,292.00
Deborah R. Tope	(SPL)	1,199.68	\$115.00	\$137,963.20
Deborah R. Tope	(SPL)	22.45	\$125.00	\$2,806.25
Robert Malloy	(PL)	16.60	\$100.00	\$1,660.00
Robert Malloy	(PL)	40.40	\$115.00	\$4,646.00
Michael L. Goldberg	(P)	612.13	\$425.00	\$260,155.25
Josh B. Ewing	(A)	371.10	\$250.00	\$92,775.00
Robert Trujillo	(PL)	8.10	\$100.00	\$810.00
Robert Trujillo	(PL)	21.50	\$115.00	\$2,472.50
Amber Fayerberg	(A)	3.70	\$0.00	\$0.00
Amber Fayerberg	(A)	54.90	\$225.00	\$12,352.50
Cynthia J. Kolson	(P)	13.50	\$100.00	\$1,350.00
Cynthia J. Kolson	(P)	3.70	\$115.00	\$425.50
Frank T. Davis	(A)	612.50	\$225.00	\$137,812.50
Jesse Boyd	(A)	152.50	\$225.00	\$34,312.50
Nicholas T. Hart	(A)	303.80	\$225.00	\$68,355.00
Shari Rives	(P)	37.50	\$115.00	\$4,312.50
TOTAL		6,092.53		\$1,705,119.45

** Based on historic hourly rates.*

Title:

(P) Partner

(A) Associate

(LC) Law Clerk

(SPL) Senior Paralegal

(PL) Paralegal

(CR) Contract Reviewer

Ex. A - Time Summary

**MANMOHAN DHILLON, et al. v. Anheuser-Busch, LLC et al., Case
No. 14CECG03039 JMS**

Exhibit B - EXPENSE REPORT

FIRM NAME: Freedman Boyd Hollander & Goldberg PA

REPORTING PERIOD: Inception through 04/01/2023

CATEGORY	DESCRIPTION (If necessary)	CUMULATIVE COSTS
Litigation Assessment		\$0.00
Court Costs - Filing Fees		\$2,950.00
Experts/consultants		\$206,543.16
Federal Express / UPS /Ontrac		\$1,731.92
Postage / U.S. Mail		\$19.31
Service of Process		\$0.00
Messenger/delivery		\$0.00
Hearing Transcripts		\$36.00
E-Discovery/Data Storage		\$120.00
Depositions		\$6,276.98
Investigation		\$1,652.50
Lexis/westlaw		\$0.00
Photocopies - in House		\$5,558.86
Photocopies - Outside		\$590.06
Telephone/telecopier		\$834.28
Travel - Transportation (Airplanes - Coach Fares Only)		\$41,415.12
Travel - Meals		\$4,540.88
Travel - Hotels		\$10,190.55
Miscellaneous		\$0.00
TOTAL EXPENSES		\$282,459.62
TOTAL CREDITS		\$4,511.62
TOTAL EXPENSES		\$277,948.00