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Superior Court of California  
County of Fresno  
By: Alexandria Payne, Deputy

6 COLEMAN & HOROWITT, LLP  
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11 Attorneys for Plaintiffs  
12 [Additional Counsel on Signature Page]

13 **IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
14 **IN AND FOR THE COUNTY OF FRESNO**

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

22 Plaintiffs,

23 v.

24 ANHEUSER-BUSCH, LLC, DONAGHY  
25 SALES, LLC, a California Corporation;  
26 ANHEUSER-BUSCH DOES 1-5 and DOES  
27 6 through 50, inclusive,

27 Defendants.

CASE NO. 14CECG03039 JMS

**DECLARATION OF DARRYL J.  
HOROWITT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR AN AWARD  
OF ATTORNEYS' FEES AND EXPENSES  
ON BEHALF OF COLEMAN &  
HOROWITT LLP**

JUDGE: Honorable Jonathan M. Skiles

DATE: TBD

TIME: TBD

DEPT: 403

1 I, DARRYL J. HOROWITT, hereby declare and state:

2 1. I am an attorney at law duly licensed to practice in all courts of the State of  
3 California and am a partner with the law firm of Coleman & Horowitz, LLP (the "**Firm**"), one of  
4 the attorneys of record for plaintiff herein.

5 2. I have personal knowledge of the facts contained herein and if called upon as a  
6 witness, would testify competently thereto.

7 3. This declaration is filed in support of Plaintiffs' Motion for Attorney's Fees.

8 4. I and my law firm have represented the plaintiffs in this matter since its inception.  
9 During that period of time, I and my law firm have been involved in the following aspects of this  
10 litigation:

11 a. The direction and strategy of presenting plaintiffs' claims;

12 b. The drafting of pleadings and motions;

13 c. The mediation(s) and negotiations that ultimately resulted in the  
14 settlement agreement now before the Court.

15 5. While our Firm does not have a current resume, the last resume prepared by our  
16 Firm, which includes bios of the attorneys who worked with me on this matter, is attached as  
17 Exhibit D to the previously filed Declaration of Dennis Stewart In support of Plaintiffs'  
18 Unopposed Motion for Preliminary Approval of Class Action Settlement dated November 14,  
19 2023.

20 6. During my Firm's representation of plaintiffs in this case, the lawyers, paralegals  
21 and law clerks who worked on this case expended 800.91 hours, representing a total lodestar of  
22 \$187,355.15, calculated at our firm's historical hourly rates. The hourly rates employed in this  
23 calculation are the same hourly rates we charge to clients who pay for our services by the hour.  
24 The times and charges were recorded contemporaneously with the provision of services.  
25 Regularly during this period, and in addition, in preparation for this submission, I reviewed the  
26 time entries of all billers in this case to eliminate or reduce unnecessary, redundant or  
27 unreasonable charges. The summary and detail of my firm's lodestar in this case, as reduced by  
28 me and as captured by our Firm's billing system, is attached hereto as **Exhibit A**.

1           7.       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 \$1,953.57. Each of  
4 those expenditures was reasonable and necessary and was recorded contemporaneously with the  
5 expenditure, employing my firm’s financial control systems. Regularly during this period, and in  
6 addition, in preparation for this submission, I reviewed every entry of costs incurred to assure  
7 that it was appropriately assigned to this case and was correct. The detail of the expenditures for  
8 which my firm seeks reimbursement is attached hereto as **Exhibit B**.

9           8.       All of the time and expenditures were reasonable and necessary to prosecute this  
10 litigation and to obtain the valuable settlement with Defendants, and the time and expenditures  
11 were made for the direct benefit of the Class. These expenses were incurred for such things as  
12 photocopying, messenger services, telephone and facsimile charges, filing fees, and meal, hotel,  
13 and transportation charges for travel.

14           I declare under penalty of perjury under the laws of the State of California that the  
15 forgoing is true and correct. Executed on April 17, 2024, at Fresno, California.

16 

17 \_\_\_\_\_  
18 DARRYL J. HOROWITT

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

**Exhibit A - TIME REPORT**

**Firm Name: Coleman & Horowitz LLP**

**Reporting Period: Inception through December 13, 2023**

<b>PROFESSIONAL</b>	<b>TITLE</b>	<b>CUMULATIVE HOURS</b>	<b>HISTORIC HOURLY RATE</b>	<b>CUMULATIVE LODESTAR*</b>
Darryl Horowitz	P	45.55	\$350.00	<b>\$15,942.50</b>
Darryl Horowitz	P	82.26	\$390.00	<b>\$32,081.40</b>
Darryl Horowitz	P	27.85	\$410.00	<b>\$11,418.50</b>
Darryl Horowitz	P	0.60	\$425.00	<b>\$255.00</b>
Darryl Horowitz	P	27.40	\$450.00	<b>\$12,330.00</b>
Russell W. Reynolds	P	3.50	\$300.00	<b>\$1,050.00</b>
Sheryl D. Noel	P	0.20	\$300.00	<b>\$60.00</b>
Judith M. Sasaki	P	0.10	\$390.00	<b>\$39.00</b>
Rema Koligian	A	2.90	\$250.00	<b>\$725.00</b>
Gary S Shuster	A	31.70	\$275.00	<b>\$8,717.50</b>
Gary S Shuster	P	38.55	\$325.00	<b>\$12,528.75</b>
Sherrie M Flynn	A	5.50	\$275.00	<b>\$1,512.50</b>
Sherrie M Flynn	A	7.60	\$290.00	<b>\$2,204.00</b>
Sherrie M Flynn	P	0.80	\$390.00	<b>\$312.00</b>
Naji A Alshikhaiti	PL	20.60	\$165.00	<b>\$3,399.00</b>
Naji A Alshikhaiti	PL	1.60	\$185.00	<b>\$296.00</b>
Susan E Hamilton	PL	485.90	\$165.00	<b>\$80,173.50</b>
Robert K Ashley	A	8.50	\$265.00	<b>\$2,252.50</b>
Herman S Chatrath	LC	9.80	\$210.00	<b>\$2,058.00</b>
<b>TOTAL</b>		<b>800.91</b>		<b>\$187,355.15</b>

*\* Based on historic hourly rates.*

**Title:**

**(P) Partner**

**(A) Associate**

**(LC) Law Clerk**

**(SPL) Senior Paralegal**

**(PL) Paralegal**

**(CR) Contract Reviewer**

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

**Exhibit B - EXPENSE REPORT**

**FIRM NAME:** Coleman & Horowitz, LLP

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**REPORTING PERIOD:** Inception through December 13, 2023

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<b>CATEGORY</b>	<b>DESCRIPTION (If necessary)</b>	<b>CUMULATIVE COSTS</b>
Litigation Assessment		\$0.00
Court Costs - Filing Fees		\$1,708.60
Experts/consultants		\$0.00
Federal Express / UPS /Ontrac		\$82.36
Postage / U.S. Mail		\$0.00
Service of Process		\$0.00
Messenger/delivery		\$111.17
Hearing Transcripts		\$120.10
Investigation		\$0.00
Lexis/westlaw		\$0.00
Photocopies - in House		\$0.00
Photocopies - Outside		\$234.08
Telephone/telecopier		\$0.00
Travel - Transportation (Airplanes - Coach Fares Only)		\$197.26
Travel - Meals		\$0.00
Travel - Hotels		\$0.00
Miscellaneous	Refund Dept. ABC	-\$500.00
<b>TOTAL EXPENSES</b>		<b>\$1,953.57</b>