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Superior Court of California
County of Fresno
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14 **IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
15 **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,

25 Plaintiffs,

26 v.

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

Defendants.

CASE NO. 14CECG03039 JMS

**DECLARATION OF SATNAM PABLA IN
SUPPORT OF PLANTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

JUDGE: Honorable Jon M. Skiles

DATE: May 21, 2024

TIME: 3:30PM

DEPT: 403

1 I, SATNAM PABLA, declare as follows:

2 1. I am one of the representative plaintiffs in this case. I have personal knowledge of
3 the facts stated in this Declaration.

4 2. During the class period, I owned and operated the retail location, GMG Food Store
5 101, located at 755 S. Madera Avenue, Madera, California 93637, and Madera Avenue Market,
6 located at 416 S. Madera Avenue, Madera, California 93637.

7 3. During that time, I continually purchased Anheuser-Busch beer products from
8 Donaghy Sales, LLC. I continued in business subsequent to the filing of the case with Donaghy
9 Sales remaining my only supplier of Anheuser Busch beer.

10 4. I became involved in the pricing issues raised in the case before the case was
11 brought. I was among the retailers who addressed the issues in the case prior to the case being
12 filed. I was among the retailers who addressed our concerns with Donaghy. I also interacted with
13 the City of Madera on the matter. After we were not able to reach a satisfactory resolution of those
14 issues, I, along with others, met with and eventually hired the lawyers who represented the
15 proposed class of retailers in this case.

16 5. After the case was filed, I was among the few retailers who were active in assisting
17 the lawyers. I met and spoke with our lawyers numerous times. During those meetings, I along
18 with other retailers, including the other Plaintiffs, discussed and provided information about our
19 businesses and the pricing practices with which we were concerned and which became the subject
20 of the case.

21 6. I contributed \$2,000 to help finance the case.

22 7. In addition to assisting the lawyers in understanding our business and our concerns
23 with the business practices at issue in the case, I took part in meetings and telephone calls about
24 the case and the information I was required to provide in the case. I spoke with the lawyers about
25 the progress of the case as well. During the litigation, I met and spoke with counsel about a large
26 number of Interrogatories and Requests for Production of Documents. I searched for documents
27
28

1 responsive to the Defendants' requests and provided documents to counsel. I am informed that in
2 all, with the assistance of counsel, I and the other Plaintiffs responded to 79 Special Interrogatories,
3 21 Form Interrogatories, 68 Requests for Production of Documents and 21 Requests for
4 Admission. I was provided draft responses to review and approve before they were served.

5 8. My deposition was taken twice in the case; on February 25, 2016 for about 8 hours
6 and again on May 17, 2016 for an additional hour. Prior to the depositions I spoke and met with
7 counsel to prepare for the deposition.


8 9. Throughout the case, I frequently communicated with the Plaintiffs lawyers in
9 individual and group calls about a variety of matters. These included conversations concerning
10 the information I provided for discovery and the responses I made, and conversations about
11 relevant facts, the status of the case, case strategy and potential settlement.

12 10. Throughout the case, I understood that as a proposed representative of the class it
13 was my obligation to do all I was asked to do to help the lawyers and to follow the progress of the
14 case and did so. Counsel kept me regularly informed about the case.

15 11. Among the things I consulted with counsel about was settlement negotiations. Prior
16 to, during, and subsequent to settlement talks and the mediation we talked with our lawyers about
17 settlement terms.

18 12. I have discussed the proposed Settlement with counsel and believe that the
19 proposed settlement is in the best interests of the class and for that reason support it.

20 I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th
21 day of April 2024, at MADERA California.

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25 SATNAM PABLA
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