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Superior Court of California
County of Fresno
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Attorneys for Plaintiffs
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11 **IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
12 **IN AND FOR THE COUNTY OF FRESNO**

13
14 MANMOHAN DHILLON, dba RANCHOS
15 VALERO, SATNAM PABLA, dba GMG
16 FOOD STORE 101 and MADERA AVE.
17 MARKET, SERGE HAITAYAN, dba 7-11
18 NUMBER 17906b, DALJIT SINGH, dba
19 LIQUOR MAX, and PAR VENTURES, LLC,
20 dba, QUICK PICK, on Their Own Behalves
21 and on Behalf of All Others Similarly Situated
22 and on Behalf of the General Public,

23 Plaintiffs,

24 v.

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

Defendants.

CASE NO. 14CECG03039 JMS

**DECLARATION OF PARMINDER
SINGH 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, PARMINDER SINGH, declare as follows:

2 1. I am a Member/Organizer of Par Ventures LLC, dba Quick Pick 2, one of the
3 representative plaintiffs in this case. I have personal knowledge of the facts stated in this
4 Declaration.

5 2. During the class period, through Par Ventures LLC, I owned and operated the retail
6 location, Quick Pick 2, located at 5210 E. Olive Avenue, Fresno, California 93727. During that
7 time, I continually purchased Anheuser-Busch beer products from Donaghy Sales, LLC. I
8 continued in business subsequent to the filing of the case with Donaghy Sales remaining my only
9 supplier of Anheuser Busch beer.

10 3. My involvement in the matters at issue in the case began prior to the bringing of
11 this case. Prior to the case being filed, I was among the retailers who interacted with Donaghy on
12 behalf of beer retailers in Fresno and Madera counties with respect to the pricing practices which
13 were the subject of the case. I also met with the California Department of Alcohol Beverage
14 Control and City of Fresno officials with respect to these matters in an attempt to resolve them
15 without litigation. When we were not able to reach a satisfactory resolution of those issues, I,
16 along with others, met with and eventually hired the lawyers who represented the proposed class
17 of retailers in this case.

18 4. After the case was filed, I, like my other co-Plaintiffs, was active in helping the
19 Plaintiffs' lawyers to understand our business and to have the facts relevant to our concerns. I met
20 and spoke with Dennis Stewart and Joe Goldberg and others from their offices who were chosen
21 to be our counsel. During those numerous meetings, we provided the lawyers information about
22 our businesses and our buying practices of beer as well as the matters with which we were
23 concerned and which were the subject of the case.

24 5. I contributed \$2,000 to the fund which helped finance the litigation of the case.

25 6. In addition to assisting the lawyers in understanding our business and our concerns
26 with the business practices at issue in the case, I was involved in numerous meetings and telephone
27

1 calls and received communications about the progress of the case and things which I was called
2 upon to do to assist counsel. Among those things were meeting and speaking with counsel with
3 regard to discovery requests. During the litigation, I consulted with counsel about a large number
4 of Interrogatories and Requests for Production of Documents. I searched for documents
5 responsive to the Defendants' requests and provided documents to counsel. I am informed that in
6 all, with the assistance of counsel, I and the other Plaintiffs responded to 79 Special Interrogatories,
7 21 Form Interrogatories, 68 Requests for Production of Documents and 21 Requests for
8 Admission. I was provided draft responses to review and approve before they were served.

9
10 7. My deposition was taken on September 25, 2016 for just over 9 hours. Prior to the
11 deposition I spoke and met with counsel for the Plaintiffs to prepare for the deposition.

12 8. Throughout the litigation, I frequently communicated with counsel in individual
13 and group calls about a variety of matters. These included conversations concerning the multiple
14 discovery obligations and responses I made, and informal conversations with counsel about
15 relevant facts, the status of the case, case strategy and potential settlement at various times
16 throughout the case.

17 9. Throughout the case, I understood that as a proposed representative of the class it
18 was my obligation to do all I was called on to do to assist counsel and to monitor the progress of
19 the case and did so. Counsel kept me regularly informed of significant developments in the case.

20 10. I and my fellow Plaintiffs were consulted about settlement negotiation prior to
21 during, and subsequent to settlement talks, including the mediation which resulted in the proposed
22 settlement.

23 11. I have discussed the proposed Settlement with counsel and believe that the
24 proposed settlement is in the best interests of the class and for that reason support it.

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



PARMINDER SINGH

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