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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,

Plaintiffs,

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 MANMOHAN
DHILLON IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

JUDGE: Honorable Jon M. Skiles

DATE: May 21, 2024

TIME: 3:30PM

DEPT: 403

1 I, MANMOHAN DHILLON, 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, Rancho Valero
5 located at 37047 Avenue 12, Madera, California 93636. During that time, I continually purchased
6 Anheuser-Busch beer products from Donaghy Sales, LLC. I continued in business subsequent to
7 the filing of the case with Donaghy Sales remaining my only supplier of Anheuser Busch beer.

8 3. I became involved in the issues raised in the case before the case was filed and
9 remained involved throughout the case. Prior to the case being filed I was among the retailers
10 who communicated with Donaghy on behalf of beer retailers in Fresno and Madera counties with
11 respect to the pricing practices which were the subject of the case. After we were not able to reach
12 a satisfactory resolution of those issues, I was among those who spoke with and eventually hired
13 the lawyers who represented us in this case.

14 4. After the case was filed, I was active in assisting the lawyers. I met and spoke with
15 Dennis Stewart and Joe Goldberg and others from their offices on many occasions. During those
16 meetings, I and the other Plaintiffs, provided information about our businesses and the pricing
17 practices with which we were concerned.

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

19 6. In addition to helping the lawyers understand our business and our concerns, I was
20 involved in numerous meetings and telephone calls and received communications about the
21 progress of the case and things which I was called upon to do to assist counsel. Among those
22 things were meeting and speaking with counsel with regard to the questions and documents which
23 we were required to respond. During the case, I searched for documents and information
24 responsive to the Defendants' requests and provided documents to counsel. I am informed that in
25 all, with the assistance of counsel, I and the other Plaintiffs responded to 79 Special Interrogatories,
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1 21 Form Interrogatories, 68 Requests for Production of Documents and 21 Requests for
2 Admission. I was provided draft responses to review and approve before they were served.

3 7. My deposition was taken twice. The first session was taken on February 24, 2016
4 for about 8 ½ hours. The second deposition took place on May 17, 2016 for about an hour. Prior
5 to the depositions I spoke and met with counsel for the Plaintiffs to prepare for the deposition.

6 8. Throughout the litigation, I frequently communicated with counsel in individual
7 and group calls about the case. These included conversations concerning the multiple discovery
8 requests and responses I made, various other matters, the status of the case, case strategy and
9 potential settlement.

10 9. Throughout the case, I understood that as a proposed representative of the class it
11 was my obligation to do all I was called upon to do to assist our counsel and to monitor the progress
12 of the case and did so. Counsel kept me regularly informed of significant developments in the
13 case.

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

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

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

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MANMOHAN DHILLON