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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 DALJIT SINGH IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY AND FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND FOR THE AWARD
OF SERVICE FEE**

JUDGE: Honorable Jon M. Skiles

DATE: May 21, 2024

TIME: 3:30PM

DEPT: 403

1 I, DALJIT SINGH, 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, Liquor Max,
5 located at 497 North Clovis, Suite 206, Clovis, California 93611. During that time, I continually
6 purchased Anheuser-Busch beer products from Donaghy Sales, LLC. I continued in business
7 subsequent to the filing of the case with Donaghy Sales remaining my only supplier of Anheuser
8 Busch beer.

9 3. Prior to the case being filed I was among the retailers who interacted with Donaghy
10 and complained about the business practice relating to coupons which were the subject of the case.
11 After we were not able to reach a satisfactory resolution of the case, I along with others met with
12 and hired the lawyers who assisted us on the case.

13 4. I was active in assisting the lawyers in the prosecution of this case from prior to the
14 time the case throughout the time it has been pending. I met with and had phone conversations
15 with Dennis Stewart and Joe Goldberg and others from their offices who were chosen to be our
16 counsel. During those numerous meetings, I and other retailers, including the other Plaintiffs,
17 provided a range of background information about the business and business practices with which
18 we were concerned and which were the subject of the case. I contributed \$2,000 to the litigation
19 of the case.

20 5. In addition to assisting the lawyers in understanding our business and our concerns
21 with the business practices at issue in the case I was involved in numerous meetings and telephone
22 calls and received communications about the progress of the case and things which I was called
23 upon to do to assist counsel. Among those things were meeting and speaking with counsel with
24 regard to discovery requests. During the litigation, I consulted with counsel about a large number
25 of Interrogatories and Requests for Production of Documents. I searched for documents
26 responsive to the Defendants' requests and provided documents to counsel. I am informed that in
27
28

1 all, with the assistance of counsel, the Plaintiffs responded to 79 Special Interrogatories, 21 Form
2 Interrogatories, 68 Requests for Production of Documents and 21 Requests for Admission. I was
3 provided draft responses to review and approve before they were served.

4 6. My deposition was taken on February 23, 2016 for nearly 9 hours. Prior to the
5 deposition I spoke and met with counsel for the Plaintiffs to prepare for it.

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

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

14 9. 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 10. 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.

21
22
23 Daljit Singh
24 DALJIT SINGH