	E-Served: Dec 28 2022 4:54PM PST	via Case Anywnere				
1 2 3 4 5 6 7 8	PAUL HASTINGS LLP STEPHEN L. BERRY (SB# 101576) stephenberry@paulhastings.com BLAKE R. BERTAGNA (SB #273069) blakebertagna@paulhastings.com 695 Town Center Drive Seventeenth Floor Costa Mesa, California 92626-1924 Telephone: (714) 668-6200 Facsimile: (714) 979-1921 Attorneys for Defendant PACIFIC 2.1 ENTERTAINMENT GROUP, INC.					
9	COUNTY OF LOS ANGELES					
10						
11	JEROME DIVINITY, on behalf of himself and	CASE NO. 20STCV32700				
12	others similarly situated, Plaintiffs,	Hon. Elihu M. Berle Dept. 6				
13	v.	DECLARATION OF STEPHEN L.				
14 15	PACIFIC 2.1 ENTERTAINMENT GROUP, INC., a California corporation; JAMES	BERRY IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL				
16	KAPENSTEIN, an individual and DOE 1 through and including DOE 10,	Date: February 22, 2023				
17	Defendants.	Time: 9:00 a.m. Dept. 6				
18		Date Action Filed: August 27, 2020 Trial Date: None				
19		22.00 2 000 1 000				
20 21						
$\begin{bmatrix} 21 \\ 22 \end{bmatrix}$						
$\begin{bmatrix} 22 \\ 23 \end{bmatrix}$						
24						
25						
26						
27						
28	LEGAL_US_W # 114709294.1					
	DECLARATION OF STEPHEN L. BERRY IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL					

DECLA	RATIO	N OF	STEPHEN	L.	BERRY
		\mathbf{N}			DUNKI

California state courts. I am a partner in the law firm of Paul Hastings LLP and am lead

counsel for defendant Pacific 2.1 Entertainment Group, Inc. in this action, as well as the

consolidated with this action: Schwanke v. Minim Productions, Inc., LASC case no.

defendants in the following subsequently filed actions, which the parties have requested be

20STCV40597; Basaker v. Minim Productions, Inc., LASC case no. 21STCV41363; and

Graham v. ABC Signature Studios, Inc., LASC case no. 22STCV00192 (the defendants in allof

knowledge of the matters set forth herein, and, if called upon to do so, I could and would testify

I am not aware of any facts giving rise to any actual or potential conflicts

I am not aware of any other pending matter or action asserting claims that

competently to them. I submit this declaration in support of plaintiff's unopposed motion for

of interest that would preclude the appointment of CPT, Inc. as the settlement administrator in

will be extinguished or adversely affected by the proposed settlement in this action. Though

counsel for plaintiff in this action represents other plaintiffs asserting similar claims against

Asgard Productions IV, LLC, Twentieth Century Fox Film Corporation, and ABC Signature,

the Settling Defendants has an interest in or involvement with CPT, Inc.

this matter. Specifically, none of the Settling Defendants nor the individual attorneys representing

the cases being collectively referred to herein as the "Settling Defendants"). I have personal

I am an attorney at law duly licensed to practice before all of the

2

1

_

I, Stephen L. Berry, declare:

preliminary approval of the class action settlement.

impacted by the proposed settlement in this action.

2.

3.

3

4

5

7

6

8

10

11 12

13 14

15

16

1718

19

20

21

22

2324

25

26

27

28

LEGAL_US_W # 114709294.1

LLC, which entities are affiliated with the Settling Defendants, the claims in those actions are not

- 1	il and the state of the state o					
1	4. None of the Settling Defendants or individual attorneys representing the					
2	Settling Defendants has an interest in or involvement with Inclusion Matters by Shane's					
3	Inspiration, which is a non-profit corporation that advocates for disabled children. A member of					
4	my global law firm, Paul Hastings LLP, provides volunteer service as a member of the Board of					
5	Directors of Inclusion Matters by Shane's Inspiration, but that individual had no involvement in					
6	this action.					
7						
8	I declare under penalty of perjury of the laws of the State of California that the foregoing					
9	is true and correct.					
10						
11	Executed on December 22, 2022, at Costa Mesa, California.					
12	Dkep LP Jen					
13						
14	Stephen L. Berry					
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
/ X	· ·					

LEGAL_US_W # 114709294.1