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*Counsel for Plaintiffs and the Class*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

TODD HALL and GEORGE ABDELSAYED individually and on behalf of all others similarly situated,  
*Plaintiffs,*  
  
v.  
  
MARRIOTT INTERNATIONAL, INC.,  
a Delaware corporation,  
  
*Defendant.*

Case No. 3:19-cv-01715-JO-AHG  
  
CLASS ACTION  
  
**DECLARATION OF ROBERT TEEL IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**  
  
Date: July 10, 2024  
Time: 9:30 a.m.  
Courtroom 4C  
Hon. Jinsook Ohta

1 Pursuant to 28 U.S.C. § 1746, I, Robert Teel, hereby declare and state as  
2 follows:

3 1. I am a member in good standing of the State Bar of California, and the  
4 United States District Court for the Southern District of California. I, along with my  
5 co-counsel, represent Plaintiffs Todd Hall and George Abdelsayed (“Plaintiffs”) and  
6 serve as Class Counsel<sup>1</sup> pursuant to the Court’s Order granting in part Plaintiffs’  
7 motion for class certification in the above-captioned matter. ECF No. 180. I make  
8 this declaration in support of Plaintiffs’ Motion for Final Approval of Class Action  
9 Settlement (the “Motion”). This declaration is based on my own personal knowledge,  
10 and if called to testify, I could and would do so competently on the matters stated  
11 herein.

12 2. I have served as counsel for the Plaintiffs since September 13, 2019,  
13 shortly after the initial complaint in this Action was filed. I have been actively and  
14 personally involved in the (a) research, preparation, and drafting of the first amended  
15 complaint, (b) review and research for the opposition to the motion to dismiss the  
16 first amended complaint, (c) research, preparation, and drafting of the first amended  
17 complaint for public injunctive relief in the related Case No. 3:23-cv-01764-JO-AHG  
18 (originally filed in San Diego Superior Court and removed to this court by  
19 Defendant), (d) mediation and negotiation of the proposed resolution of this case and  
20 the State Case litigation, and (e) the pretrial preparation and proceedings.

21 3. This Action has been vigorously litigated on behalf of the Class for over  
22 four years as described and more fully set forth in my declaration in support of  
23 Plaintiffs’ motion for preliminary approval of this class action settlement.  
24 ECF No. 279-2. Prosecution of this Litigation necessarily required the commitment  
25 of a substantial amount of time, labor, and effort from myself and my co-counsel at

26 \_\_\_\_\_  
27 <sup>1</sup> Capitalized terms shall have the same meaning as set forth in the Class Action  
28 Settlement Agreement attached as Exhibit 1 to my declaration in support of Plaintiffs’  
motion for preliminary approval of this class action Settlement (ECF No. 279-3)  
unless otherwise noted.

1 the Law Offices of Ronald A. Marron, APLC and Bursor & Fisher, P.A.  
2 ECF No. 279-2, ¶¶ 23 and 31. *See also* Declaration of Robert Teel In Support of  
3 Motion for Approval of Payment for Partial Reimbursement of Litigation Costs and  
4 Service Awards filed in conjunction herewith.

5 4. The Settlement Agreement was negotiated at arm's-length and was part  
6 of hard-fought settlement discussions spanning eight months. ECF No. 279-2, ¶¶ 20  
7 and 23. The Settlement Agreement is the only operative Settlement document  
8 pursuant to the Court's Order dated May 17, 2024 granting preliminary approval of  
9 the Settlement. ECF No. 282.

10 5. Pursuant to the preliminary approval Order, Plaintiffs' counsel at Bursor  
11 & Fisher, P.A. posted website notice<sup>2</sup> of the Settlement on May 20, 2024 in the form  
12 and content attached as Exhibit A to the Settlement Agreement. ECF No. 279-3,  
13 pgs. 17-19 and ECF No. 282, §§ 2, 3, 7, and 11. Class Counsel thereafter  
14 continuously monitored the website and is administering the applicable provisions of  
15 the Settlement Agreement in accordance with its terms, including but not limited to  
16 providing the Class Notice, monitoring the website, and standing ready to receive  
17 and examine Class Member objections.

18 6. Pursuant to Section 9 of the preliminary approval Order and as further  
19 set forth in the Class notice, any Class Member has the right object to the Settlement.  
20 The last day for Class Members to submit written objections to Class Counsel asking  
21 the Court to deny approval of the Settlement was June 16, 2024 (30 days after the  
22 date of the preliminary approval Order).<sup>3</sup>

23 \_\_\_\_\_  
24 <sup>2</sup> <https://www.bursor.com/hall-v-marriott-international-inc-important-settlement-information/>

25 <sup>3</sup> The preliminary approval Order also states that any such objections must be made  
26 in accordance with the terms set forth in the Class Notice and will be timely only if  
27 postmarked no later than 35 days after the date of this Order granting preliminary  
28 approval of this Settlement. The timeliness of objections and notices shall be  
conclusively determined by the postmark date. ECF No. 282, § 10. In addition to the  
foregoing, the notice also states Class Members may file with the Court objections  
to the Settlement by July 3, 2024. ECF 279-3, pg. 19.

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7. As of the date of this declaration Class Counsel has not received any objections from any Class Member or any other person. Defendant not reported receiving any objections either.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 3, 2024

  
\_\_\_\_\_  
Robert Teel, *An Attorney for Plaintiffs and the Class*