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Class Counsel

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

TODD HALL and GEORGE ABDELSAYED individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

MARRIOTT INTERNATIONAL, INC.,
a Delaware corporation,

Defendant.

Case No. 3:19-cv-01715-JO-AHG

CLASS ACTION

**DECLARATION OF
L. TIMOTHY FISHER IN
SUPPORT OF PLAINTIFFS’
MOTION FOR APPROVAL OF
PAYMENT FOR PARTIAL
REIMBURSEMENT OF
LITIGATION COSTS AND
SERVICE AWARDS**

Date: July 10, 2024

Time: 9:30 a.m.

Ctrm: 4C

Judge: Hon. Jinsook Ohta

1 I, L. Timothy Fisher, hereby declare as follows:

2 1. I am a partner in the law firm of Bursor & Fisher, P.A., counsel for
3 Plaintiffs Todd Hall and George Abdelsayed. I make this declaration in support of
4 Plaintiffs' Motion for Approval of Payment for Partial Reimbursement of Litigation
5 Costs and Service Awards based on my personal knowledge. If called to testify, I
6 could and would competently testify to the matters contained herein.

7 2. The Court appointed my firm along with the Law Offices of Ronald A.
8 Marron and the Law Office of Robert L. Teel as Class Counsel in this case. *See* ECF
9 No. 180 at 43 ("The Court appoints Lead Plaintiffs as class representatives and the
10 Law office of Ronald A. Marron, the Law Office of Robert L. Teel, and Bursor &
11 Fisher, P.A. as class counsel.").

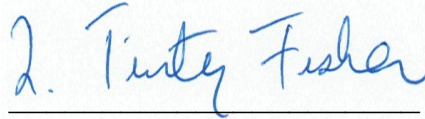
12 3. My firm undertook the prosecution of this case on a contingent fee basis
13 and assumed a significant risk of nonpayment or underpayment. To date, my firm
14 remains completely uncompensated for approximately 1,000 hours of time invested
15 in the case.

16 4. In addition, my law firm incurred \$163,510.67 in costs and expenses as
17 set forth below that were reasonably necessary for the prosecution of this case and
18 would normally have been billed to a client paying for my services on an hourly
19 basis:

- 20 • \$115,599.50 in expert fees for Dr. J. Michael Dennis and Charlene
21 Podlipna, CPA
- 22 • \$28,716.70 for deposition transcripts
- 23 • \$11,271.82 in travel costs
- 24 • \$4,922.65 in litigation costs (*e.g.*, document hosting)
- 25 • \$3,000 in miscellaneous costs (*e.g.*, PACER, Lexis/Westlaw, filing
26 fees, etc.)

1 I declare under penalty of perjury of the laws of the United States that the
2 foregoing is true and correct.

3 Executed on this 2nd day of July, 2024 at Walnut Creek, California.

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6 L. Timothy Fisher
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