

1 **LAW OFFICES OF RONALD**
 2 **A. MARRON**
 3 RONALD A. MARRON (SBN 175650)
 4 *ron@consumersadvocates.com*
 5 LILACH HALPERIN (SBN 323202)
 6 *lilach@consumersadvocates.com*
 7 651 Arroyo Drive
 8 San Diego, CA 92103
 9 Telephone: (619) 696-9006
 10 Facsimile: (619) 564-6665

BURSOR & FISHER, P.A.
 L. Timothy Fisher (SBN 191626)
ltfisher@bursor.com
 1990 North California Blvd., Suite 940
 Walnut Creek, CA 94596
 Telephone: (925) 300-4455
 Facsimile: (925) 407-2700

7 **LAW OFFICE OF ROBERT L. TEEL**
 8 ROBERT L. TEEL (SBN 127081)
 9 *lawoffice@rlteel.com*
 10 1425 Broadway, Mail Code: 20-6690
 11 Seattle, Washington 98122
 12 Telephone: (866) 833-5529
 13 Facsimile: (855) 609-6911

Class Counsel

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

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

Plaintiffs,

vs.

22 MARRIOTT INTERNATIONAL, INC.,
 23 a Delaware corporation,

Defendant.

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

CLASS ACTION

**DECLARATION OF RONALD
 MARRON IN SUPPORT OF
 PLAINTIFFS' MOTION FOR
 ATTORNEYS' COSTS AND
 INCENTIVE AWARDS**

Date: July 10, 2024

Time: 9:30 a.m.

Ctrm: 4C

Judge: Hon. Jinsook Ohta

1 I, Ronald Marron, hereby declare as follows:

2 1. I am a member in good standing of the State Bar of California and of
3 the United States District Courts for the Central, Eastern, Northern, and Southern
4 Districts of California as well as the Ninth Circuit Court of Appeals and the United
5 States Supreme Court. I submit this Declaration in Support of Plaintiffs' Motion for
6 Attorneys' Costs and Incentive Awards. I make this Declaration based on my
7 personal knowledge and if called to testify, I could and would competently testify to
8 the matters contained herein.

9 2. I have practiced civil litigation for over 24 years. My work experience
10 and education began in 1984 when I enlisted in the United States Marine Corps
11 (Active Duty 1984- 1988, Reserves 1988-1990) and thereafter received my Bachelor
12 of Science in Finance from the University of Southern California (1991). While
13 attending Southwestern University School of Law (1992-1994), I also studied
14 Biology and Chemistry at the University of Southern California and interned at the
15 California Department of Corporations with emphasis in consumer complaints and
16 fraud investigations. I was admitted to the State Bar of California in January of 1995
17 and have been a member in good standing since that time. In 1996, I started my own
18 law firm with an emphasis in consumer fraud.

19 3. My firm, the Law Offices of Ronald A. Marron, APLC, currently
20 employs four full-time attorneys. My firm has an in-depth knowledge of litigating
21 consumer class action cases. The attorneys at my firm have years of experience
22 litigating class action cases, and are well-versed, in particular, in the respective
23 merits and risks of consumer class action cases.

24 4. My firm devoted substantial time to investigating the claims against
25 Marriott International, Inc. My firm also expended resources researching and
26 developing the legal claims at issue. Substantial time and resources were also
27 dedicated to serving and obtaining discovery.

28 5. Prosecuting and settling the claims in this matter demanded

1 considerable time and labor. This Settlement was reached only after Plaintiffs were
2 successful in their Motion for Class Certification and successfully opposed
3 Defendant's Motion for Summary Judgment.

4 6. Settlement negotiations consumed further time and resources. A
5 significant amount of time was devoted to negotiating and drafting of the Agreement
6 and the preliminary approval process, and to all actions required thereafter pursuant
7 to the preliminary approval order. Each of the above-described efforts was essential
8 to achieving the Settlement before the Court.

9 7. In my opinion, the Settlement is an extremely fair and reasonable
10 recovery for the Settlement Class in light of Defendant's defenses, and the
11 challenging and unpredictable path of litigation that Plaintiffs and the class would
12 have faced absent the Settlement.

13 8. In undertaking to prosecute this case on a contingent fee basis, my firm
14 assumed a significant risk of nonpayment or underpayment. Despite my firm's
15 efforts in litigating this Action, including over 1,500 hours of attorney and paralegal
16 work, my firm remains completely uncompensated for the time invested in the
17 Action, in addition to expenses that were advanced.

18 9. My law firm incurred more than \$88,000 in total costs that were
19 reasonably necessary for the prosecution of this litigation and would normally have
20 been billed to a client paying for my services on a regular basis. The costs incurred
21 by my firm are summarized in Table 1 below:

22 **TABLE 1**


<u>Category</u>	<u>Amount</u>
Service of Process; Mail; eFiling	\$3,213.27
Court Reporter/Depositions	\$17,198.44
Travel	\$1,855.16
Experts	\$55,153.75
Mediation	\$10,450.00
Calendaring Software and Misc.	\$729.04

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TOTAL:	\$88,599.66
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I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on this 2nd day of June, 2024 at San Diego, California.



Ronald Marron