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**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 GEORGE ABDELSAYED 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.
Courtroom 4C
Hon. Jinsook Ohta

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

3 1. I, along with plaintiff Todd Hall serve as Class representatives in this
4 case pursuant to the Court's Order granting in part Plaintiffs' motion for class
5 certification (ECF No. 180) in the above captioned matter. I make this declaration in
6 support of Plaintiffs' Motion for Approval of Payment for Partial Reimbursement of
7 Litigation Costs and Service Awards. This declaration is based on my own personal
8 knowledge, and if called to testify I could and would do so competently on the matters
9 stated herein.

10 2. I have been involved in this case since May 27, 2021. I have stayed
11 informed about the litigation and actively participated in it through, without
12 limitation, continuing telephone conferences and correspondence with Mr. Fisher and
13 his associates; reviewing pleadings, documents, and material filings and orders
14 entered by the Court; locating, reviewing, and providing documents and responding
15 to interrogatories and discovery requests; providing input regarding litigation and
16 settlement strategy; and discussing and reviewing, approving, and agreeing to the
17 terms and conditions of the settlement agreement.

18 3. I was on standby during the nearly full day mediation before Judge Peter
19 D. Lichtman (Ret.) and have communicated with Mr. Fisher about the proceedings
20 several times by telephone. I was also deposed for two half-day sessions in San
21 Diego, California in the afternoon on January 9, 2022 and then again in the morning
22 on January 22, 2022. I drove to the Westin Hotel in San Diego from my home in San
23 Ysidro, California for the depositions. The drive from my home is approximately a
24 half hour each way.

25 4. At my deposition Marriott's lawyer, Mr. Leary, aggressively questioned
26 me about my experiences when booking a stay at the Marriott Coronado Island
27 Marriott Resort & Spa and hotel stays in general. The deposition grew contentious
28 at times, especially after it was stopped and the lawyers called the judge to resolve

1 their dispute about some of the questioning. The whole process seemed
2 unnecessarily difficult and was very unpleasant. The deposition and preparation for
3 my deposition consumed roughly 7 hours of my time including travel time.

4 5. I spoke with Mr. Fisher a few days before the trial scheduled for
5 April 22, 2024 and became concerned when I heard that Defendant's lawyers had
6 made threats to sue us based on some sort of claim they were making about how this
7 litigation would cause Marriott legal irreparable harm. Although I don't completely
8 understand how they could do that, I was very anxious about attending the trial and
9 the possibility of being sued.

10 6. I estimate I spent at least two hours locating, reviewing, and providing
11 documents to try to respond to Defendant's discovery requests and approximately
12 two hours reviewing my deposition. My participation in this case was important to
13 me because I wanted to help stop the practice of businesses charging hidden or so-
14 called junk fees. I believe I have meaningfully contributed to accomplishing that
15 objective through this lawsuit.

16 7. I authorized the settlement of this case after communicating with
17 Mr. Fisher about the risks and uncertainties of continuing the litigation. I believe the
18 settlement represents a very good outcome under the circumstance, is in the best
19 interest of the Class, and satisfies the objectives of the litigation.

20 8. I also believe the settlement could not have been achieved without the
21 efforts of the attorneys who represented me and the Class. I believe the settlement is
22 fair, reasonable, and adequate and should be approved by the Court. I approve the
23 request up to a total of \$75,000 for litigating this case, although I understand that the
24 amount of costs and service awards is up to the Court to decide.

25 9. I estimate the direct amount of time I have spent on this case, equals or
26 exceeds 11 hours. In addition, to settle this Class action litigation I was required to
27 provide a general release of all my claims against the Defendant. I would not have
28 approved and entered into the settlement on behalf of the Class if Class members'

1 releases had also been required. Based on the amount of time and resources directly
2 spent prosecuting this litigation, the threat of being sued, and on the value of the
3 general release which I am required to give (but not the Class), I respectfully request
4 reimbursement in the amount of \$5,000 as a service award for serving as the Class
5 representative in the prosecution of this case.

6 10. I did not become involved in this action to obtain any special benefit,
7 nor has any such benefit ever been promised to me. I have not received, been
8 promised nor offered, nor will I accept any form of compensation, directly or
9 indirectly, for prosecuting or for serving as a party and Class representative in this
10 action except for such fees, costs, or other payments as the Court expressly approves
11 to be paid or reimbursed to me or on my behalf.

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

13 Dated: 7/1/2024, 2024 *George E Abdelsayed*
14 George E Abdelsayed (Jul 1, 2024 10:23 EDT)
15 George Abdelsayed

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