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6 Attorneys for Plaintiff ADRIANA HERNANDEZ,  
Individually, and on behalf of all others similarly situated  
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES**

10  
11 ADRIANA HERNANDEZ, individually, and  
on behalf of all others similarly situated,

12 Plaintiffs,

13  
14 v.

15 2523 E. ANAHEIM, INC. dba XS  
16 AFTERHOURS GENTLEMENS CLUB, a  
California corporation; and DOES 1 through  
17 100, inclusive,

18 Defendants.  
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**CONFORMED COPY**  
**ORIGINAL FILED**  
Superior Court of California  
County of Los Angeles

**JAN 19 2021**

Sherri R. Carter, Executive Officer/Clerk of Court

Lead Case No. 19STCV16831  
(Related to Case No. 19STCV15211)

*Assigned for All Purposes to the Hon. Ann I.  
Jones in Department 11*

**CLASS ACTION**

**DECLARATION OF GEORGE  
CATALOIU IN SUPPORT OF MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

**Non-Appearence Case Review:**

Date: January 29, 2021  
Time: 8:30 a.m.  
Location: Dept. 11

**Motion for Preliminary Approval:**

Date: February 24, 2021  
Time: 11:00 a.m.  
Location: Dept. 11 via LACC

Action Filed: May 15, 2019

1 **TO THE COURT, ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that pursuant to the Court’s Tentative Ruling filed, which  
3 was and E-Served on January 15, 2021, class counsel files this Supplemental Declaration  
4 addressing the issues requested in the Tentative Ruling:

5 **DECLARATION OF GEORGE CATALOIU**

6 I, George Cataloiu, declare:

7 1. I am over 18 years of age and a resident of California. I am the President of  
8 Defendant 2523 E. Anaheim, Inc. dba XS Afterhours Gentlemen’s Club and the Manager of GC  
9 Brothers Entertainment, LLC dba The Palms Gentlemen’s Club, the named Defendants in the  
10 above-captioned case, and I have personal knowledge of the facts and statements set forth in this  
11 declaration, and, if called upon to testify, I could and would competently testify hereto.

12  
13 **Issue 1: Provide declarations disclosing the interest or involvement by any counsel**  
14 **or party in the governance or work of the *cy pres* recipient (or lack thereof).**

15 1. The *Cy Pres* recipient is the League of Women Voters (“LWV”) (Settlement  
16 Agreement ¶49(c)). To my knowledge, no counsel nor parties have any involvement in the  
17 governance or work for the LWV. Until the LWV was brought up in relation to being the *Cy*  
18 *Pres* recipient in this matter I was not familiar with this organization. Neither myself nor anyone  
19 in my family has personal involvement or interest in this organization. We have not monetarily  
20 contributed to this organization and have not volunteered time for this organization.

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22 **Issue 2: Address how notice of final judgment will be given to the class.**

23 2. I have discussed the January 15, 2021 Tentative Ruling with my counsel who I  
24 understand has met and conferred with the claims administrator and counsel for Plaintiffs. As I  
25 understand this issue, they have agreed that upon entry Notice of the Final Judgment shall be  
26 posted on the claims administrator’s website under the provisions of Cal. Rules of Court, Rule  
27 3.771(b). As part of their meet and confer, they have agreed that Notice of the Final Judgment  
28 shall be posted on the claims administrator’s website along with other settlement documents

1 through the Effective Date which will be the 61<sup>st</sup> day after service of the Notice of Entry of Final  
2 Order and Judgment. Stipulation and Settlement Agreement ¶55. I am in agreement with this.

3  
4 I declare under penalty of perjury and the laws of the State of California, United States of  
5 America that the foregoing is true and correct.

6 Executed on this 18th day of January 2021, at, California.

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8 

9 George Cataloiu  
10 President of Defendant 2523 E. Anaheim,  
11 Inc. dba XS Afterhours Gentlemen's Club  
12 and Manager of GC Brothers  
13 Entertainments, LLC dba The Palms  
14 Gentlemen's Club  
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1 **PROOF OF SERVICE**

2 I am employed in the County of Orange, State of California. I am over the age of 18 and  
3 not a party to the within action. My business address is 650 Town Center Drive, Suite 1530, Costa  
4 Mesa, California 92626. On January 19, 2021, I served the within document(s) described as:

5 **DECLARATION OF GEORGE CATALOIU IN SUPPORT OF MOTION FOR  
6 PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

7 on the interested parties in this action as stated below:

8 *Attorneys for Defendant 2523 E. Anaheim,  
9 Inc. dba XS Afterhours Gentlemens Club:*

10 Steven J. Shapero  
11 Martin M. Shapero  
12 SHAPERO & SHAPERO  
13 5950 Canoga Ave., Suite 404  
14 Woodland Hills, CA 91367  
15 Tel: (818) 710-1200  
16 Fax: (818) 710-1447  
17 *sshapero@shaperoandshapero.com*  
18 *mshapero@shaperoandshapero.com*

19  BY ELECTRONIC TRANSMISSION VIA CASE ANYWHERE: I caused said  
20 document(s) to be sent to the parties listed on the Electronic Service List maintained by  
21 Case Anywhere in the manner set forth in the Court’s Order Authorizing Electronic Service  
22 dated December 18, 2020.

23  BY MAIL: By placing a true copy of the foregoing document(s) in a sealed envelope  
24 addressed as set forth above. I am readily familiar with this firm's practice for collection  
25 and processing of correspondence for mailing. Under that practice it would be deposited  
26 with the U.S. Postal Service on that same day with postage thereon fully prepaid in the  
27 ordinary course of business. I am aware that on motion of the party served, service is  
28 presumed invalid if postal cancellation date or postage meter date is more than one day after  
date of deposit for mailing contained in affidavit.

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

Executed on January 19, 2021, at Costa Mesa, California.

Lisa Dancel  
(Type or print name)

*/s/ Lisa Dancel*  
(Signature)