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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

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 v.

14
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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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 STEVEN J.
SHAPERO 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 which was filed
3 and E-Served on January 15, 2021, counsel for Defendants 2523 E. Anaheim, Inc. dba XS
4 Afterhours Gentlemens Club and GC Brothers Entertainment, LLC dba The Palms Gentlemen’s
5 Club files this Declaration addressing the issues requested in the Tentative Ruling:

6 **DECLARATION OF STEVEN J. SHAPERO**

7 I, Steven J. Shapero, declare:

8 1. I am over the age of eighteen (18) and have personal knowledge of the facts set
9 forth in this Declaration. If called as a witness, I could and would testify competently to such
10 facts under oath.

11 2. I am an attorney at law admitted to practice in all courts in the State of California.
12 I am a partner at Shapero & Shapero, attorneys of record for Defendants 2523 E. Anaheim, Inc.
13 dba XS Afterhours Gentlemens Club and GC Brothers Entertainment, LLC dba The Palms
14 Gentlemen’s Club (“Defendants”). I am the primary lawyer at our firm who is responsible for
15 this matter. Except where stated upon information and belief, I have personal knowledge of the
16 facts stated herein and, if called upon as a witness, I could and would competently testify thereto
17 under oath. This Declaration is submitted in support of the Motion for Preliminary Approval of
18 Class Action Settlement filed by Plaintiff.

19
20 **Issue 1: Provide declarations disclosing the interest or involvement by any counsel**
21 **or party in the governance or work of the *cy pres* recipient (or lack thereof).**

22 3. The *Cy Pres* recipient is the League of Women Voters (“LWV”) (Settlement
23 Agreement ¶49(c)). To my knowledge, no counsel nor parties have any involvement in the
24 governance or work for the LWV. I am familiar with this organization and have been for many
25 years but only as a result of their work and involvement in advocating for voters rights.
26 However, neither I nor anyone in my family has personal involvement or interest in this
27 organization. We have not monetarily contributed to this organization and have not volunteered
time for this organization.

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 STEVEN J. SHAPERO 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
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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)