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County of Los Angeles

MAY 16 2016

Sherri R. Carter, Executive Officer/Clerk
By: Stephanie Amador, Deputy
Stephanie Amador

1 Paul R. Kiesel, State Bar No. 119854
kiesel@kiesel.law
2 Jeffrey A. Koncius, State Bar No. 189803
koncius@kiesel.law
3 Mariana Aroditis, State Bar No. 273225
aroditis@kiesel.law
4 Melanie Meneses Palmer, State Bar No. 286752
palmer@kiesel.law
5 **KIESEL LAW LLP**
8648 Wilshire Boulevard
6 Beverly Hills, California 90211-2910
Tel: 310-854-4444
7 Fax: 310-854-0812

8 *Attorneys for Plaintiffs and the Class*

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST DISTRICT**

11 **COLIN HIGGINS PRODUCTIONS, LTD.,**

CASE NO. BC499179 (Related to Case Nos.
BC499180, BC499181, BC499182,
BC500040, and BC540146)

12 **Plaintiff,**

13 **v.**

*Assigned to the Honorable Elihu M. Berle,
Department 323*

14 **PARAMOUNT PICTURES**
15 **CORPORATION, and DOES 1-100,**

CLASS ACTION

16 **Defendant.**

**DECLARATION OF MICHAEL ELIAS IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: June 10, 2016
Time: 10:00 a.m.
Dept.: 323

Action Filed: January 16, 2013
Trial Date: None

KIESEL LAW LLP
Attorneys at Law
Beverly Hills, California

KIESEL LAW LLP
Attorneys at Law
Beverly Hills, California

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I, Michael Elias, hereby declare:

1. I am one of the named plaintiffs and class representatives in the above entitled class action lawsuit.

2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. I am personally familiar with the facts set forth in this Declaration. If called as a witness I could and would competently testify to the matters stated herein.

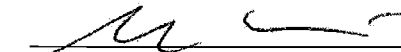
3. I have reviewed, approved, and consented to the *confidential* Joint Prosecution Agreement between counsel for Plaintiffs and the class in the above entitled action: Kiesel Law LLP; Pearson, Simon & Warshaw, LLP; Johnson & Johnson, LLP; and Boucher LLP ("Class Counsel").

4. The *confidential* Joint Prosecution Agreement discloses how Class Counsel will be paid, including the proposed fee split by and amongst Class Counsel.

5. I fully support the class action settlement in this lawsuit and believe the settlement is fair, reasonable and adequate.

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

Executed on 5/10, 2016, at PARIS, France.



Michael Elias