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12 Attorneys for Plaintiff

13 **UNITED STATES DISTRICT COURT**  
 14 **CENTRAL DISTRICT OF CALIFORNIA**

15 KATHLEEN SONNER on Behalf of  
 16 Herself and All Others Similarly  
 17 Situated,

17 Plaintiff,

18 v.

19 SCHWABE NORTH AMERICA, INC.  
 20 and NATURE'S WAY PRODUCTS,  
 21 LLC,

21 Defendants.

Case No. 5:15-cv-01358-VAP (SPx)

**CLASS ACTION**

**DECLARATION OF KATHLEEN SONNER IN SUPPORT OF APPLICATION FOR SERVICE AWARD**

Date: January 25, 2021  
 Time: 2:00 p.m.

USDJ: Virginia A. Phillips  
 Courtroom: 8A, 8th Fl., 1st Street-LA  
 USMJ: Sheri Pym  
 Courtroom: 3 or 4, 3rd Fl., R'side

Date Filed: July 7, 2015

**DEMAND FOR JURY TRIAL**

BLOOD HURST & O' REARDON, LLP

1 I, KATHLEEN SONNER, declare:

2 1. I am a plaintiff and Class Representative in the above-entitled class  
3 action lawsuit. I make this declaration in support of Plaintiff's motion for final  
4 approval of class action settlement, which includes a request that I be awarded a  
5 \$5,000 service award. I have personal knowledge of the matters set forth in this  
6 declaration and if called upon, could competently testify to them.

7 2. I have remained informed and have been actively involved in this  
8 litigation over the past five years, from its inception through the present. Since 2015,  
9 I met in-person, had many telephone conversations, and routinely exchanged emails  
10 with my attorneys about this litigation. In addition to initiating communications about  
11 the conduct at issue, I have promptly responded to the many inquiries that have been  
12 made for further information. Periodically throughout the litigation I have had calls  
13 and exchanged emails with my attorneys to keep up to date on the status of the case  
14 and proceedings. I have also reviewed several of the pleadings before they were filed  
15 or agreed on, including the complaint and settlement agreement, and provided  
16 comments and asked follow-up questions about these documents. I reviewed  
17 Defendants' multiple written discovery requests, followed up with my attorneys about  
18 responsive documents and information, and made searches for responsive  
19 information.

20 3. I also was deposed in this case. In addition to sitting for a deposition that  
21 lasted several hours, I spent time in advance meeting with my attorneys to prepare for  
22 the deposition. Additionally, I was prepared to travel to Los Angeles and testify at  
23 trial. As I had done during the deposition, I was fully committed to testifying at trial  
24 in support of my claims and as a proposed representative of the Class.

25 4. From the very beginning, I was aware of my obligations as a class  
26 representative. In signing the retainer agreement with my attorneys, I understood and  
27 agreed that I was not promised any compensation other than my share of what was  
28 recovered on behalf of the proposed class. Nonetheless, I agreed to become a class

1 representative because of what happened to me and because I wanted to stand up for  
2 others like me. I have worked hard to fulfill my obligations.

3 Executed on December 15, 2020, at California.

4  
5 By:   
6 KATHLEEN SONNER

BLOOD HURST & O' REARDON, LLP

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