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12 [*Additional Counsel Cont'd. After Caption*]

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

15 GLENN KESSELMAN, an individual,
16 on behalf of himself and all others
17 similarly situated, *et al.*,

18 Plaintiffs,

19 vs.

20 TOYOTA MOTOR SALES, U.S.A.,
21 INC., a California Corporation

22 Defendant.

Case No. 2:21-cv-06010-TJH-JC

HON. TERRY J. HATTER JR.

**JOINT DECLARATION IN
SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL
OF CLASS ACTION
SETTLEMENT**

Judge: Hon. Terry J. Hatter, Jr.

Place: Courtroom #9C

Hearing Date: March 2, 2026

Hearing Time: 10:00 a.m.

1 Thomas P. Rosenfeld, *admitted pro hac vice*
2 Kevin P. Green, *admitted pro hac vice*
3 Daniel S. Levy, *admitted pro hac vice*
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11 Attorneys for Plaintiffs
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1 Pursuant to 28 U.S.C. § 1746, we, Mike Arias and Kevin P. Green, declare as
2 follows:

3 1. I, Mike Arias, am managing partner of the law firm of Arias, Sanguinetti,
4 Wang & Team LLP (“ASWT”), and am a member in good standing of the California
5 Bar and of the United States District Court for the Central District of California.
6 ASWT represents the Plaintiffs and Settlement Class in this Action. I am fully
7 competent to make this declaration.

8 2. I, Kevin P. Green, am a shareholder with the law firm of Goldenberg
9 Heller & Antognoli, P.C. (“GHA”), am a member in good standing of the Illinois Bar
10 and the Missouri Bar, and am admitted *pro hac vice* to this Court in this Action. GHA
11 represents the Plaintiffs and Settlement Class in this Action. I am fully competent to
12 make this declaration.

13 3. The statements in this declaration are based on our personal knowledge
14 and recollection as of this date, and we would competently testify thereto if called
15 upon to do so.

16 4. We make this Joint Declaration in support of Plaintiffs’ Motion for Final
17 Approval of Class Action Settlement (the “Final Approval Motion”) regarding
18 Plaintiffs’ settlement with Defendant Toyota Motor Sales, U.S.A., Inc.¹

19 5. Class Counsel has substantial experience representing plaintiffs in
20 consumer class litigation and in other complex litigation similar to the present Action.
21 Firm resumes for ASWT and GHA are set forth in connection with our Fee Petition,
22 Dkt. 170-3 and 170-4.

23 6. In our joint declarations in support of Plaintiffs’ Motion for Preliminary
24 Approval and Fee Petition (*See* Dkt. 145-2 and 170-2), we provided detailed
25 information regarding the procedural background of this Action; the work performed

26 ¹ Unless otherwise stated, all defined terms used herein have the meanings set forth
27 in the Motion for Final Approval (Dkt. 184), Memorandum of Points and
28 Authorities (Dkt. 184-1), and Settlement Agreement (Dkt 145-3).

1 by Class Counsel in litigating this Action, including relating to discovery and motion
2 practice; the nature and cause of the Echo Issue in the Class Vehicles; the effectiveness
3 of the Volume Adjustment Procedure in alleviating the Echo Issue and the lack of
4 prior disclosure directly to consumers; prior unsuccessful settlement negotiations and
5 negotiations leading to the Settlement; and our view of the benefits of the Settlement
6 in conjunction with the risks and costs associated with further litigation. We hereby
7 incorporate these declarations as if fully set forth herein.

8 7. Based on Class Counsel’s extensive experience in prosecuting complex
9 consumer class actions, and after being informed of the facts, claims, and defenses at
10 issue in this Action along with the risks of proceeding through trial and appeal, Class
11 Counsel fully endorses this Settlement without reservation as being fair, reasonable,
12 and adequate, and in the best interests of the Settlement Class.

13 8. We note that our prior Joint Declaration in support of Plaintiffs’ Fee
14 Petition (Dkt. 170-2) and its Exhibit 5 included \$13,764 that Mr. Tregillis had
15 indicated would be invoiced in January for his work performed through December 18,
16 2025. Thereafter, Mr. Tregillis submitted an invoice for his work through December
17 31, 2025, totaling only \$13,454 (a reduction of \$310). He also confirmed that our
18 \$5,000 retainer could be applied to this amount, making the total paid only \$8,454.
19 That is a reduction of \$5,310 from the total amount of expenses sought, bringing the
20 total expenses sought down from \$278,683.96 to **\$273,373.96**.

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23 I declare under penalty of perjury that the foregoing is true and correct.
24 Executed on this 2nd day of February, 2026.

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26 /s/ Mike Arias

27 Mike Arias

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I declare under penalty of perjury that the foregoing is true and correct.
Executed on this 2nd day of February, 2026.

/s/ Kevin P. Green
Kevin P. Green

ATTESTATION

I, Mike Arias, hereby attest that all other signatories listed above concur in this filing's content and have authorized me to make this filing.

Dated: February 2, 2026 /s/ Mike Arias
M. Anthony Jenkins