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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.

**PLAINTIFFS' AMENDED
APPLICATION FOR
IN CAMERA REVIEW (L.R. 79-6)
[Filed along with Supporting
Declaration and [Proposed] Order]**

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1 Thomas P. Rosenfeld, *admitted pro hac vice*

2 Kevin P. Green, *admitted pro hac vice*

3 Daniel S. Levy, *admitted pro hac vice*

4 **GOLDENBERG HELLER & ANTOGNOLI, P.C.**

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11 Attorneys for Plaintiffs

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1 **TO HONORABLE COURT AND TO DEFENDANT AND ITS ATTORNEYS**
2 **OF RECORD:**

3 Pursuant to the U.S. District Court, Central District of California’s Local Rule
4 79-6 (“Local Rule 79-6”), Plaintiffs seek approval to submit Class Counsel’s
5 detailed, unredacted time records and invoices (with authenticating joint-declaration)
6 for *in camera* review in connection with Plaintiffs’ Amended Motion for Attorney’s
7 Fees, Expenses, and Service Award. As demonstrated herein, the documents should
8 be reviewed *in camera* because the attorney-client and work product privileges
9 embrace attorney time records.

10 The materials at issue consist solely of Class Counsel’s own billing records
11 and invoices and do not contain information designated confidential by any other
12 party. Accordingly, no pre-filing meet-and-confer was required under Local Rule 79-
13 5. Nonetheless, Class Counsel, Mr. Green, and Defendant’s counsel, Ms. Shook, met
14 and conferred on December 18, 2025 (via email) and December 19, 2025 (via
15 telephone and email), and Defendant indicated it would not oppose this Application
16 for In Camera Review.

17 Dated: January 6, 2026 Respectfully submitted,

18 ARIAS SANGUINETTI WANG
19 & TEAM LLP

20 By: /s/ M. Anthony Jenkins
21 Mike Arias
22 Craig S. Momita
23 M. Anthony Jenkins

24 GOLDENBERG HELLER
& ANTOGNOLI, P.C.
25 Thomas P. Rosenfeld
26 Kevin P. Green
27 Daniel S. Levy

28 *Attorneys for Plaintiffs*

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 “No document may be presented for review in camera without prior approval
3 of the Court. A person seeking in camera review of a document must describe its
4 general nature and establish why it should be reviewed in camera, citing the
5 applicable legal standard.” CA R USDCTCD Civ Rule 79-6.2 “A document accepted
6 by the Court for review in camera will not, while under review, be made part of the
7 Court's official case file, or be made available for inspection by the public or any
8 party, and need not be served on any party when presented to the Court for review.”
9 *Id.* at 79-6.1.

10 The Ninth Circuit “has approved the practice of requiring parties who seek to
11 avoid disclosure of documents to make the documents available for *in*
12 *camera* inspection, and the practice is well established in the federal courts.” *United*
13 *States v. Zolin*, 491 U.S. 554, 569 (1989). For *in camera* review, there must be a
14 sufficient showing that “creates a legitimate issue as to the application of the privilege
15 asserted.” *NISHIKA, LTD. v. FUJI PHOTO FILM CO.*, 181 F.R.D. 465, 467 (D. Nev.
16 1998) (citing *Zolin*, 491 U.S. at 571-72). Courts in the Ninth Circuit conduct *in camera*
17 review of privileged information in connection with attorney fee petitions, particularly
18 where, a here, the underlying motion for attorney fees publicly discloses aggregate
19 hours, billing rates, total lodestar figures, and an itemization of expenses. *See Real v.*
20 *Cont'l Grp., Inc.*, 116 F.R.D. 211, 213–14 (N.D. Cal. 1986) (Ninth Circuit Court of
21 Appeals “has held that the attorney-client privilege embraces attorney time, records
22 and statements to the extent that they reveal litigation strategy and the nature of the
23 services provided”) (citing *In re Grand Jury Witness*, 695 F.2d 359, 362 (9th Cir.
24 1982)); *SEC v. Pulier*, 2020 U.S. Dist. LEXIS 247491, *25 (C.D. Cal. Nov. 13, 2020)
25 (denying motion to compel production of work product documents that had been
26 submitted in camera); *Van Wingerden v. Cadiz, Inc.*, 2017 U.S. Dist. LEXIS 18800,

1 *34 (C.D. Cal. Feb. 8, 2017) (time records submitted for *in camera* review)¹;
2 *NISHIKA*, 181 F.R.D. at 467 (“*In camera* review is appropriate only after the party
3 seeking it has submitted sufficient affidavits and other evidence to the extent it can.”)
4 (citing *Wiener v. Federal Bureau of Investigation*, 943 F.2d 972, 979 (9th Cir. 1991);
5 *see also* Fed. R. Civ. P. 26(b)(3)-(4). Finally, submitting documents for *in camera*
6 review does not constitute a waiver of the privilege. *See Zolin*, 491 U.S. at 569 (“Once
7 it is clear that *in camera* review does not destroy the privileged nature of the contested
8 communications, the question of the propriety of that review turns on whether the
9 policies underlying the privilege and its exceptions are better fostered by permitting
10 such review or by prohibiting it.”); *Admiral Ins. v. U.S. Dist. Court for the Dist. of*
11 *Ariz.*, 881 F.2d 1486, 1492 (9th Cir. 1989) (“[T]he advantages of preserving the
12 privilege outweigh the inescapable disadvantages of the resultant secrecy.”).

13 Here, to assist the Court in evaluating the reasonableness of the requested fee
14 and expenses, Plaintiffs seek to submit detailed contemporaneous billing records in
15 support of their fee application and invoices in support of their expense for an *in*
16 *camera* review. Those billing records contain privileged attorney-client
17 communications, attorney mental impressions, litigation strategy, and work product.
18 Joint Declaration in Support of Plaintiffs’ Amended Application for In Camera
19 Review, ¶ 8. Likewise, the invoices include those submitted by Plaintiffs’ consultants,
20 experts, or potential experts and also reveal attorney mental impressions, litigation
21 strategy, and information protected by the consultant and work product privileges. *Id.*
22 Public disclosure would risk revealing sensitive and protected information while
23

24 ¹ Some Courts determine *in camera* review of timesheets is unnecessary to determine
25 a fee award. *See, e.g., Zakikhani v. Hyundai Motor Co.*, 2023 U.S. Dist. LEXIS
26 123158, *30 (C.D. Cal. May 5, 2023) (“[T]he number of hours counsel asserts appears
27 reasonable and the Court will not require counsel to submit time records for *in camera*
28 review.”) (citing *Parkinson v. Hyundai Motor Am.*, 796 F. Supp. 2d 1160, 1165 (C.D.
Cal. 2010) (awarding attorney’s fees based on summaries of rather than complete
billing records where counsel offered to provide records to the court *in camera*)).

1 providing no meaningful additional benefit to the Settlement Class, particularly where
2 Class Counsel’s motion for attorney fees publicly discloses aggregate hours, billing
3 rates, total lodestar figures, and an itemization of expenses.

4 Accordingly, Plaintiffs respectfully seek Court approval to present Class
5 Counsel’s time records and invoices (with authenticating joint-declaration) for *in*
6 *camera* review.

7
8 Dated: January 6, 2026

Respectfully submitted,

9
10 ARIAS SANGUINETTI WANG
& TEAM LLP

11 By: /s/ M. Anthony Jenkins

12 Mike Arias
13 Craig S. Momita
14 M. Anthony Jenkins

15 GOLDENBERG HELLER
& ANTOGNOLI, P.C.

16 Thomas P. Rosenfeld
17 Kevin P. Green
18 Daniel S. Levy

19 *Attorneys for Plaintiffs*

20
21 **ATTESTATION**

22 I, M. Anthony Jenkins, hereby attest that all other signatories listed above
23 concur in this filing’s content and have authorized me to make this filing.

24 Dated: January 6, 2026

/s/ M. Anthony Jenkins

25 M. Anthony Jenkins
26
27
28

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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'
AMENDED APPLICATION FOR
IN CAMERA REVIEW (L.R. 79-6)**

Judge: Hon. Terry J. Hatter, Jr.

Place: Courtroom #9C

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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1 Pursuant to 28 U.S.C. § 1746, we, Mike Arias, Kevin P. Green, and Richard
2 S. Cornfeld, declare as 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. I make the statements herein regarding my actions
8 and on behalf of ASWT based on my personal knowledge, my recollection, and my
9 review of the records maintained in the ordinary course of my firm’s practice, and
10 would competently testify thereto if called upon to do so.

11 2. I, Kevin P. Green, am a shareholder with the law firm of Goldenberg
12 Heller & Antognoli, P.C. (“GHA”), am a member in good standing of the Illinois Bar
13 and the Missouri Bar, and am admitted *pro hac vice* to this Court in this Action. GHA
14 represents the Plaintiffs and Settlement Class in this Action. I am fully competent to
15 make this declaration. I make the statements herein regarding my actions and on
16 behalf of GHA based on my personal knowledge, my recollection, and my review of
17 the records maintained in the ordinary course of my firm’s practice, and would
18 competently testify thereto if called upon to do so.

19 3. I, Richard S. Cornfeld, was Of Counsel with GHA from January 2023
20 until my retirement in December 2024. Prior to joining GHA, I was the owner of the
21 Law Office of Richard S. Cornfeld, LLC (“LORC”), through which I was the original
22 counsel for the Plaintiffs and the putative Class in this Action, along with my former
23 associate, Daniel S. Levy (who also joined GHA in January 2023). I, along with Mr.
24 Levy, continued to represent Plaintiffs and the putative Class upon our joining GHA.
25 I make the statements herein regarding my actions and on behalf of LORC based on
26 my personal knowledge, my recollection, and my review of the records maintained in
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1 the ordinary course of my firm’s practice, and would competently testify thereto if
2 called upon to do so.

3 4. We make this Joint Declaration in support of Plaintiffs’ Amended
4 Application for In Camera Review in connection with Plaintiffs’ Amended Motion for
5 Attorney’s Fees, Expenses, and Service Award.

6 5. In connection with this action, for each of our respective firms, billing
7 and time records and invoices, including descriptions of the work performed by
8 professionals, were regularly and contemporaneously recorded pursuant to our firm’s
9 policies and have been maintained in our respective firm’s computerized records.

10 6. In connection with our Amended Application for In Camera Review, filed
11 with our Amended Motion for Attorney’s Fees, Expenses, and Service Award, we are
12 prepared to submit, for the work performed by each of our respective firms, detailed,
13 unredacted time records presented in Microsoft Excel format, constituting a true and
14 accurate representation of the work conducted on behalf of the Class that makes up
15 the lodestar figure set forth in our Amended Motion for Attorney’s Fees, Expenses,
16 and Service Award. We are also prepared to submit invoices related to the request for
17 reimbursement of expenses.

18 7. Such detailed timekeeping records consist of true and accurate
19 spreadsheets itemizing the work performed by date, professional’s name, description,
20 hours, rate, and amount. The invoices include those submitted by Plaintiffs’
21 consultants, experts, or potential experts.

22 8. Further, such detailed records reveal privileged attorney-client
23 communications, as well as attorney mental impressions, litigation strategy, and
24 information protected by the consultant and work product privileges.

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

27 /s/ Mike Arias
28 Mike Arias

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

3 /s/ Kevin P. Green
4 Kevin P. Green

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

7 
8 Richard S. Cornfeld

9 **ATTESTATION**

10 I, M. Anthony Jenkins, hereby attest that all other signatories listed above
11 concur in this filing's content and have authorized me to make this filing.

12
13 Dated: January 2, 2026

/s/ M. Anthony Jenkins
M. Anthony Jenkins

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

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16 on behalf of himself and all others
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22 Defendant.

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

HON. TERRY J. HATTER JR.

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' AMENDED
APPLICATION FOR *IN CAMERA*
REVIEW**

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2 Kevin P. Green, *admitted pro hac vice*
3 Daniel S. Levy, *admitted pro hac vice*
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THIS MATTER having come before the Court by Plaintiffs' Amended Application for *In Camera* Review of Class Counsel's time and expense records. The Court, having considered the papers filed in support of the motion and any opposition and reply thereto; and for the reasons stated on the record; and finding good cause shown, the Court HEREBY GRANTS Plaintiffs' Application for *In Camera* Review and finds that submission of the identified documents shall not operate as a waiver of privilege or work product protections. The in camera documents shall be delivered to the Clerk's Office on or before _____.

IT IS SO ORDERED:

Date: _____

HONORABLE TERRY J. HATTER, JR.
UNITED STATES DISTRICT JUDGE