

1 J. Toji Calabro (SBN 239950)  
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES**  
10

11 JONATHAN GIANNOULIS, et al.  
12 Plaintiff

Case No. BC596668

**CLASS ACTION**

13  
14 v.

[Assigned for all purposes to The Honorable  
Maren E. Nelson, Spring Street Dept. 17]

15  
16 DIRECTV, LLC,  
17 Defendant

**DECLARATION OF J. TOJI CALABRO  
CONCERNING THE FILING OF  
SUPPLEMENTAL MATERIALS IN  
ADVANCE OF THE APRIL 25, 2022,  
HEARING ON PLAINTIFFS'  
PLAINTIFFS' UNOPPOSED MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS AND PAGA ACTION  
SETTLEMENT AND FOR  
CERTIFICATION OF SETTLEMENT  
CLASS**

18  
19  
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21  
22 Date: April 25, 2022  
23 Time: 9:00 a.m.  
24 Courtroom: Spring Street Dept. 17  
Judge: Hon. Maren Nelson

25 Action Filed: October 1, 2015  
26 Trial Date: N/A

27 [Documents Filed Concurrently Herewith /  
attached]  
28

1 **DECLARATION OF J. TOJI CALABRO**

2 I, J. Toji Calabro, declare as follows:

3 1. I am an attorney and founder of the Calabro Law Office. I have been licensed to  
4 practice law in the State of California since 2005. I am counsel to plaintiffs in this matter. I make  
5 this declaration concerning the filing of Plaintiffs’ supplemental materials in support of Plaintiffs’  
6 Unopposed Motion for Preliminary Approval of Class and PAGA Action Settlement and for  
7 Certification of Settlement Class (the “Motion”). Unless stated otherwise, I have personal  
8 knowledge of the facts stated in this declaration and, if called to testify, could and would testify  
9 competently thereto.

10 2. The Court-ordered deadline for filing Plaintiffs’ supplemental materials in support  
11 of the Motion was April 1, 2022.

12 3. On Friday, April 1, 2022, I submitted for e-filing with the Court, several documents  
13 in support of the Motion, including:

- 14 a. Plaintiffs’ Amended Notice of the Hearing on the Motion;
- 15 b. Plaintiffs’ Supplemental Memorandum of Points and Authorities in Support  
16 of the Motion;
- 17 c. Supplemental Declaration of George A. Hanson in support of the Motion;
- 18 d. Supplemental Declaration of J. Toji Calabro in support of the Motion;
- 19 e. Declaration of Todd C. Werts in support of the Motion;
- 20 f. Declaration of Bradford C. Lear in support of the Motion;
- 21 g. Declaration of Jonathan Giannoulis in support of the Motion;
- 22 h. Declaration of Deshon R. Allen in support of the Motion;
- 23 i. Declaration of Jonathan Paul Concerning the Qualification of ILYM Group,  
24 Inc.;
- 25 j. Index of Exhibits; and
- 26 k. Proposed Order Granting the Motion.

27 A true and correct copy of the email confirmation I received, confirming that these documents had  
28 been submitted to the Court for electronic filing on April 1, 2022, is attached hereto as **Exhibit A**.



# **Exhibit A**

## Order Confirmation for JONATHAN GIANNOULIS VS DIRECTV LLC, Case # BC596668

donotreply@caseanywhere.mail.legalconnect.com  
<donotreply@caseanywhere.mail.legalconnect.com>

Fri 4/1/2022 5:27 PM

To: Toji Calabro <tojicalabro@calabro-law.com>

### Court eFile Order Confirmation

This confirms Case Anywhere LLC has received your Court eFiling order to eFile the following document(s):

[Notice of Hearing on Petition \(name extension\);](#)  
[Memorandum of Points & Authorities;](#)  
[Declaration \(name extension\);](#)  
[Declaration \(name extension\);](#)  
[Declaration \(name extension\);](#)  
[Declaration \(name extension\);](#)  
[Declaration \(name extension\);](#)  
[Declaration \(name extension\);](#)  
[Declaration \(name extension\);](#)  
[Exhibit List;](#)  
[Order \(name extension\)](#)

At: **Spring Street Courthouse (Civil eFiling)**

Your document(s) have been electronically transmitted to the court **today (Fri, Apr 1, 2022)** and placed in the queue for review by the Clerk.

Once your eFile order has been reviewed you will receive a status update with details stating if your documents were Accepted, Partially Accepted or Rejected by the Clerk, followed by your conformed or received copy(s) or else rejection notice.

Should you have any questions, please contact Customer Support at (800) 884-3163, email [efiling@caseanywhere.com](mailto:efiling@caseanywhere.com) or you can log in and manage your cases and orders at <https://caseanywhere.legalconnect.com>

Thank you for using Case Anywhere LLC.

Order(s): **5733289**

Billing Code: **SysGen**

eFile Transaction Number(s): **22LA00407248**

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21860 Burbank Blvd. Suite 125, Woodland Hills, CA 91367  
[Contact Us](#)

# **Exhibit B**

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Branch Name:** Spring Street Courthouse  
**Mailing Address:** 312 North Spring Street  
**City, State and Zip Code:** Los Angeles CA 90012

**SHORT TITLE:** JONATHAN GIANNOULIS VS DIRECTV LLC

**CASE NUMBER:**  
BC596668

**NOTICE OF COURT REJECTION OF ELECTRONIC FILING**

The electronic filing described by the summary data below was reviewed and rejected by the Superior Court of California, County of LOS ANGELES.

**E-Filing Summary Data**

Electronically Submitted By: Legal Connect  
Transaction Number: 22LA00407248  
Court received Date: 04/01/2022  
Court received Time: 3:26 pm  
Notice Generated Date: 04/04/2022  
Notice Generated Time: 10:20 am

**Documents Electronically Rejected**

Notice of Hearing on Petition (name extension)  
Memorandum of Points & Authorities  
Declaration (name extension)  
Declaration (name extension)  
Declaration (name extension)  
Declaration (name extension)  
Declaration (name extension)  
Declaration (name extension)  
Declaration (name extension)  
Exhibit List  
Order (name extension)

**This electronic filing was rejected based on the following reason(s)**

Reject Reason Other: IFCDE- Incorrect filing code selected: Please resubmit both Supplemental Declarations as DEC090

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**PROOF OF SERVICE**

I am over the age of 18 years and not a party to the cause; I am employed in, or am a resident of the County of Jackson, Missouri where the mailing occurs. My business address is Two Pershing Square, 2300 Main Street, 9th Floor, Kansas City, Missouri 64108. I caused the preceding documents to be served on April 4, 2022 upon the following counsel:

Raymond W. Bertrand  
**PAUL HASTINGS LLP**  
4747 Executive Dr., 12fth Floor  
San Diego, CA 90071  
Phone: 858.458.3013  
Fax: 858458.3005  
E-mail: [raymondbertrand@paulhastings.com](mailto:raymondbertrand@paulhastings.com)  
*Attorneys for Defendant, Directv LLC*

X **VIA CASE ANYWHERE ELECTRONIC SERVICE:** I transmitted via the Internet a true copy(s) of the above-entitled document(s) to the Case Anywhere Electronic Service system and concurrently caused the above-entitled document(s) to be sent to the recipients listed pursuant to the Service List maintained by and as it exists on that database. The file transmission was reported as complete and a copy of the Receipt Page/Confirmation will be maintained with the original document(s) in this office.

XX **(STATE):** I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on April 4, 2022.

\_\_\_\_\_  
*/s/ J. Toji Calabro*  
J. Toji Calabro