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5 *Attorneys for Plaintiffs United Desert Charities, Fred Ede III, Emily Williams,
Bruce Pritchard, Jean Steiner and Settlement Class*

6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

9 UNITED DESERT CHARITIES, *et*
10 *al.*,

11 Plaintiffs,

12 vs.

13 SLOAN VALVE COMPANY, *et*
al.,

14 Defendants

Case No. 2:12-cv-06878 SJO (SHx)

**DECLARATION OF STEVEN H.
FRANKEL IN SUPPORT OF JOINT
MOTION FOR FINAL APPROVAL
OF MODIFICATIONS OF
SETTLEMENT AGREEMENT AND
PLAN OF ALLOCATION**

The Honorable. S. James Otero

Date: September 18, 2017

Time: 10:00 a.m.

Courtroom: 10C

Consolidated Cases:

Berube v. Flushmate

2:13-cv-02372-SJO-SH

Brettler v. Flushmate

2:13-cv-02499-SJO-SH

Kubat, et al. v. Flushmate

2:13-cv-02425-SJO-SH

Patel v. Flushmate

2:13-cv-02428-SJO-SH

Related Cases:

Mergens v. Sloan Valve Co.

2:16-cv-05255-SJO-SKx

Dimov v. Sloan Valve Co.

1:12-cv-09700 (N.D. Ill)

1 I, Steven H. Frankel, declare as follows:

2 1. I am an attorney duly licensed to practice law before all courts of the
3 State of California, and I am a partner in the law firm of Dentons US LLP, counsel
4 of record for Defendants Sloan Valve Company, Flushmate, a division of Sloan
5 Valve Company ("Flushmate"), AS America, Inc., doing business as American
6 Standard Brands, Kohler Co., Gerber Plumbing Fixtures, LLC, and Mansfield
7 Plumbing Products, LLC, in this action. I submit this declaration in support of the
8 Joint Motion for Final Approval of Modifications of Settlement Agreement and
9 Plan of Allocation. I have personal knowledge of all facts set forth herein, and, if
10 called as a witness, I can and would testify competently thereto under oath.

11 2. Pursuant to the Notice Plan¹, Settlement Class Members were given
12 the opportunity to comment on the proposed modifications to the Settlement and
13 Plan of Allocation by sending a letter to my attention. As of the date of this
14 declaration, I have received no such letter.

15 I declare under penalty of perjury, under the laws of the United States of
16 America, that the foregoing is true and correct.

17 Executed this 30th day of June 2017, at Oakland, California.

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/s/ Steven H. Frankel

Steven H. Frankel

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27 ¹ Initial capitalized terms utilized herein have the same definitions as set forth in the Class
28 Action Settlement Agreement and Release, filed January 31, 2014 (ECF No. 119-1) unless
otherwise specified.