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May 2023

ATTENTION: CALIFORNIA CLASS ACTION ATTORNEYS
Please Consider LATLC as Your Next *Cy Pres* Recipient

Dear Sir or Madam:

We are the Los Angeles Trial Lawyers' Charities (LATLC), a 501(c)(3) tax exempt non-profit corporation. We are trial lawyers who work to improve the lives of the most vulnerable among us and tackle a wide range of issues of great socioeconomic importance within our community. We assist persons with disabilities, aid survivors of abuse, provide funding for children's education and extracurricular activities, support military veterans, and serve the homeless, hungry, and unemployed through financial support and community service. Most of the funds raised by LATLC go directly to members of our community, with only 17% allocated as administrative costs. Most within our leadership and membership also are leaders and members of CAOC, CAALA, AAJ, CELA, and other legal organizations working hard every day for the people of our great state of California.

**We humbly ask you to join our cause and take part in LATLC's new
 outreach initiative called the *Cy Pres* Program.**

Through the *Cy Pres* Program, LATLC is reaching out to every lawyer who has litigated a class action in any California state or federal court within the past 24 months. Our hope is that you will consider recommending LATLC as a *cy pres* recipient on one or more of your cases in the near future, should the facts of your particular case support it.

Included with this letter is LATLC's *Cy Pres* Program Packet, which consists of the following:

- Literature about LATLC, including "What We Do," "Who We Support," "Why We Began," "LATLC By The Numbers Fact Sheet;
- An informative article entitled *Who Gets the Leftovers? Understanding California's Cy Pres Doctrine*; and
- A sample Declaration In Support of Motion for Preliminary Approval previously used by several class action law firms to successfully direct *cy pres* funds to LATLC.

LOS ANGELES TRIAL LAWYERS' CHARITIES

A California Nonprofit Public Benefit Corporation

2708 Wilshire Blvd., #391, Santa Monica, CA 90403

A 501(c)(3) Organization | Federal Tax ID # 20-5658982

844-44-LATLC

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* Past President

** Director Emeritus



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May 2023
Page 2

With its broad range of services and work with partner charities, LATLC is an ideal candidate for *cy pres* awards in several class action arenas.

For example, **LATLC has received approval as a *cy pres* recipient from several California courts presiding over wage and hour class actions** as a result of LATLC's work with U.S. Vets, Ability First, Youth Mentoring Connection, Exceptional Children's Foundation, and Imagine LA. Funds have been utilized to provide professional and educational advancement opportunities to members of the greater Los Angeles community.

Through our work feeding the hungry with partner charities such as LA Mission, Downtown Women's Center, and The People Concern, among others, **LATLC is also an ideal candidate for *cy pres* awards in consumer fraud class actions** like food product mislabeling and dietary supplement cases.

If you have negotiated a class action settlement with a *cy pres* component and are looking for potential designees to work with you towards achieving preliminary and/or final approval, please contact LATLC to determine whether our organization would be an appropriate recipient. A member of our Board will be assigned to work with your team to provide everything you need to ensure a successful approval process.

We humbly ask for your support by allowing LATLC to present an application to receive *cy pres* funds in your next class action settlement.

In addition, LATLC is making a push to increase our class action attorney representation on LATLC's Honorary Board of Governors (HBOG), the support of whom is vital to fulfilling our mission to make a positive difference in greater Los Angeles on issues related to education, children, survivors of abuse, persons with disabilities, and the homeless and hungry. Our current Honorary Board membership can be viewed at <http://www.latlc.org/Honorary-Board/>.

We also ask for your support in joining LATLC's Honorary Board of Governors today. Please access the online contribution form at <http://www.latlc.org/Donate.shtml>.

With gratitude,

All Members of the Board of Directors,
Los Angeles Trial Lawyers' Charities

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WHO GETS THE LEFTOVERS?

Understanding California's Cy Pres Doctrine¹



Cy pres—pronounced “sigh pray” (although some people pronounce it “see pray”)—is an abbreviated version of the French phrase *cy près comme possible*, which translates to “as near as possible.” When applied to a class action lawsuit, the doctrine allows for residual funds from a settlement to be distributed to a nonprofit organization “whose mission is consistent with the goals of the underlying litigation,” says Ryan J. Clarkson, President and principal shareholder at Clarkson Law Firm, P.C. in Los Angeles, California.

Pursuant to California Code of Civil Procedure Section 384, the leftovers may be distributed to one or more nonprofits that “promote justice for all Californians.” More specifically, funds are generally distributed to nonprofit organizations or foundations that support projects that will benefit the class or similarly situated persons, or that promote the law consistent with the objectives and purposes of the underlying cause of action, to child advocacy programs, or to nonprofit organizations providing civil legal services to the indigent.

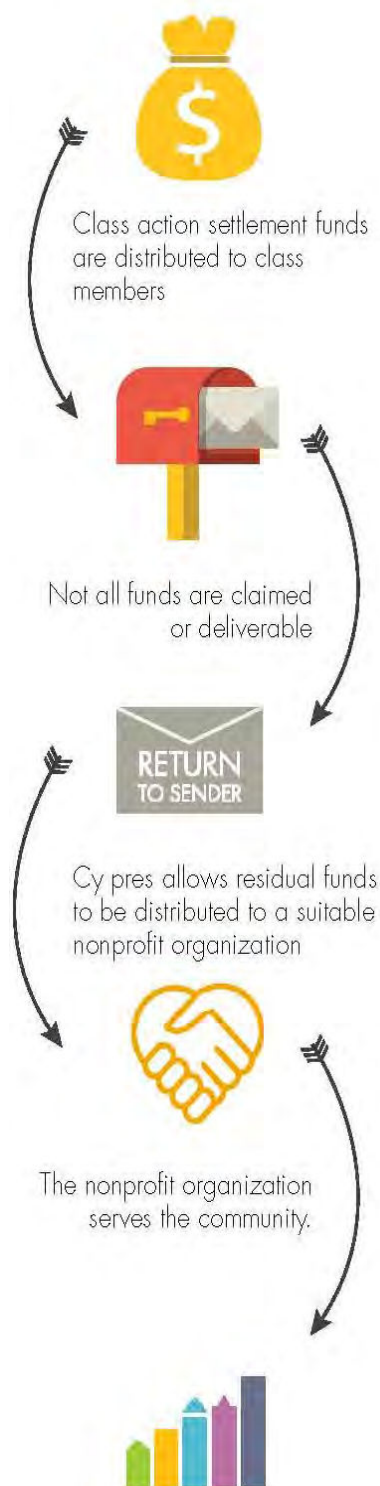
Example: LATLC

With its wide range of services, the Los Angeles Trial Lawyers' Charities (LATLC) is an ideal candidate for *cy pres* awards.

LATLC works with numerous charities in the greater Los Angeles area, focusing on issues related to children's education, survivors of abuse, persons with disabilities, and the homeless and hungry.

Money from *cy pres* awards are put directly back into the Los Angeles community. For example, *cy pres* awards will help LATLC fund grants and scholarships for at-risk youths, clothe and feed the homeless, and render much needed support to

CY PRES EXPLAINED



various other groups in the Los Angeles area.

The Process

Potential recipients are typically proposed by plaintiff's counsel; as a general rule, the defendant and defense counsel are not involved in the selection process, but they, as well as the class members, have the opportunity to object. The *cy pres* candidates are presented to the court in a written pleading. The trial judge makes the final decision subject to possible appellate review.

Choices

Courts carefully review the proposed *cy pres* recipients as part of their evaluation of the class action settlement.

It is not unheard of for a court to reject a proposed recipient. For example, in *Dennis v. Kellogg Company*, plaintiffs proposed that the *cy pres* award go to charities that provide food to people in need. While the agreement was deemed a “noble goal,” the Ninth Circuit said, “not just any worthy recipient can qualify as an appropriate *cy pres* beneficiary.” The settlement was reversed and remanded, and negotiations were reopened to select organizations that work to protect consumers from injuries caused by false advertising, a closer match to the issues of the lawsuit.

Choosing the right charities to pitch can be a daunting task considering there are about 1.5 million nonprofit organizations in the United States. Before entering into a settlement negotiation, attorneys familiarize themselves with programs, gather current information from organizations, brochures, documents, websites, and prepare to present the judge with a few options.

With its broad range of services and work with partner charities, LATLC is an ideal candidate for *cy pres* awards in a wide breadth of class action arenas.

For example, **LATLC has received approval as a *cy pres* recipient from several California courts presiding over wage and hour class actions** as a result of LATLC’s work with the LA Mission, Clothes the Deal, Youth Mentoring Connection, and LA Alliance. Funds have been utilized to provide professional and educational advancement opportunities to members of the greater Los Angeles community. In addition, through our work feeding the hungry with partner charities such as LA Mission, Downtown Women’s Center, and Ocean Park Community Center, among others, **LATLC is also an ideal candidate for *cy pres* awards in consumer fraud class actions like food mislabeling and dietary supplement cases.**

If you have a class action settlement with a *cy pres* component and are looking for potential *cy pres* designees to work with you towards achieving preliminary and/or final approval, please contact LATLC to determine whether our organization would be an appropriate recipient. A member of our Board will be assigned to work with your team to provide everything you need to ensure a successful approval process.

¹ The information used in creating this document was gathered from The Bar Association of San Francisco. KATHLEEN GUTHRIE WOODS, UNDERSTANDING CALIFORNIA’S CY PRES DOCTRINE 32 – 35 (Fall 2014).

We are



LATLC
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TRIAL LAWYERS' CHARITIES

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SCAN ME

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Your Support Makes this Possible...



\$5,558,234

to the community
in grants, gifts, and goods



122

partner charities
supported



9,353

volunteer hours since
formal service program
began in 2015



\$186,700

to more than 125 youth
sports organizations



450

people have attended a
Day of Dignity for those
experiencing homelessness



\$265,000

in college scholarships
to 96 high school
graduates in need



104

customized tricycles
presented to special
needs children



13,000

community neighbors in
need given holiday
groceries and toys

Los Angeles Trial Lawyers' Charities began sixteen years ago to uplift our community.
Trial lawyers fight for people injured by unsafe medicine,
unsafe products, and unfair business practices. **We believe in**

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supporting our community.

Los Angeles Trial Lawyers' Charities was formed to offer both financial support and community service to non-profit organizations in the greater Los Angeles area. LATLC's focus is on issues related to education, children, survivors of abuse, persons with disabilities, and homelessness.

financial and inkind donations.

LATLC has donated more than **\$5,58,234** to non-profits in the greater Los Angeles area. Since the organization began in 2006, LATLC's has provided financial grants to **122 non-profits**.

partner charity service projects

In 2015 LATLC formalized its community service activities. Since then, LATLC volunteers have worked more than 9,353 hours, doing all kinds of projects including:

- Cook and serve meals at Downtown Women's Center and The People Concern
- Provide baseball equipment to Buddy Ball teams of boys and girls with disabilities
- Paint the hallways and mulched the playground at the Exceptional Children's Foundation Early Childhood Center
- Decorate and host an annual Mother's Day party at the Bresee Youth Center
- Celebrate Valentine's Day and host bingo with seniorcitizens at the LA LGBT Center
- Add drought-resistant plants and creating edible gardens at the Vista Del Mar Family Services and PATH residences.

direct giving events

In 2016, LATLC initiated its first signature event, a holiday food and toy giveaway in South Los Angeles. Seven years later, **COMFORT & JOY** has grown to providing 500 families with 2,000 toys and bags filled with groceries and household items. Even during the pandemic, LATLC provided thousands of items distributed with our partner, LAPD's Newton Division, creating a real "Miracle on 34th Street." In 2017, a second community event was added – **THE GREAT TRYKE GIVEAWAY** – and to date we have presented adaptive bicycles to 127 children with disabilities. A third LATLC event, the **DAY OF DIGNITY** for those experiencing homelessness, includes personal services, portable showers, and 500 toiletry kits assembled by volunteers at our GREAT TRYKE GIVEAWAY.



LOS ANGELES TRIAL LAWYERS' CHARITIES

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A California Nonprofit Public Benefit Corporation

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WHO WE SUPPORT

partner charities

LATLC was formed to offer both financial support and community service to non-profit organizations in the greater Los Angeles area, focusing on education, children, survivors of abuse, persons with disabilities, and homelessness. Since 2006, LATLC has worked with 121 partner charities and donated more than \$5,558,234 in goods, gifts, and grants:

Ability First
Advancement Project
After School All Stars
Airport Marina Counseling
Alliance College
Ready Public Schools
A Place Called Home
AVIVA
Blessings in a Backpack
Blind Children's Center
Bresee Foundation
Buddy Ball
CASA Los Angeles
Child Advocacy Center of
Pomona
City Hearts
CLARE/Matrix Foundation
Clothes the Deal
Conejo Valley Free Clinic
Downtown Women's Center
El Nido Family Centers
Exceptional Children's
Foundation

First Place for Youth
First Tee of Los Angeles
Foothill Family Service
Foothill Unity Center
FreeFrom
Giving Spirit
Harmony Project
Haynes Family of Programs
Hope of the Valley
Imagine LA
Independence Center
Inner City Law Center
Jewish Family Service of L.A.
Kiwanis Club of Warner
Center
Lava Mae
LA LGBT Center
Los Angeles Mission
March of Dimes Los Angeles
MEND (Meet Each Need with
Dignity)
Miracle Project
NextStep Fitness
One Wish – One Need

OUR HOUSE Grief Support
Center
Pals n Pets
People Assisting The
Homeless (P.A.T.H.)
Pediatric Cancer
Research Foundation
People Concern
Play It Forward
POPS the Club
Power of a Shower
Rape Foundation
Reading Partners
Red Star Riders
Rising Star Music Foundation
SFV Community Mental
Health Center
SFV Refugee Children's Center
Shane's Inspiration
SoCal Trykers
South Central Scholars
Su Casa – Ending Domestic Violence
St. Anne's

St. Joseph's Center
Steam: Coders
Team Prime Time
Tierra del Sol Foundation
Toberman Neighborhood
Center
Trevor Project
Triumph Foundation
U.S. VETS
Union Station Homeless Services
Venice Community
Housing Corp.
Venice Family Clinic
Vision to Learn
Vista Del Mar Family
Services
Walk With Sally
Westside Children's
Center
Youth Mentoring
Connection

college scholarships

In 2015, LATLC implemented its annual college scholarship program to help local high school seniors attend college and become future leaders of tomorrow. Today we have provided a total of \$265,000 for 96 scholarships.

youth sports

In our effort to broaden our assistance directly to our local communities, the Los Angeles Trial Lawyers' Charities launched the Youth Sports Sponsorship Program in 2014 to help children. LATLC provides grants to little leagues and public school athletic programs. We support sports from baseball to football to cheer and dance and even synchronized swimming! LATLC has donated more than \$186,700 to 125 organizations.



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WHY WE BEGAN

our mission.

The primary purpose of the Los Angeles Trial Lawyers' Charities (LATLC) is to make a positive difference in the quality of life for people within the greater Los Angeles area, focusing on issues related to education, children, survivors of abuse, persons with disabilities, and homelessness. We do this by providing financial assistance and volunteer service to groups in need.

our history.

In 2006 a small group of Los Angeles trial lawyers for the people, consumer attorneys who fight for justice on behalf of the great people in our City of Los Angeles, embarked on a new way to serve our community beyond their roles as attorneys. Inspired by this concept of doing charitable works in our local communities, these lawyers channeled their passion for justice towards improving the conditions of the oppressed and underserved, enhancing education, safety, access to shelter and opportunities. Founded by Bruce Traney and supported by a handful of supporters, soon the group grew to a hundred founding friends and even more active members.

Today LATLC has more than **3,000 supporters**, donated more than **\$5,558,234** in grants, gifts and goods, provided **96 students with \$265,000 in college scholarships**, and **volunteered 9,353 hours** since our formal service program began in 2015. LATLC has been honored by the California State Assembly and State Senate.

our leadership.

2006 Bruce Traney
2007 Bruce Traney
2008 Bruce Traney
2009 Bruce Traney
2010 Pejman Ben-Cohen
2011 Joe Barrett

2012 Joe Barrett
2013 Robert Simon
2014 Minh Nguyen
2015 Aimee Kirby
2016 Scott J. Corwin
2017 C. Michael Alder

2018 Geraldine Weiss
2019 Gerald Marcus
2020 Alyssa Schabloski
2021 Daniel K. Kramer
2022 Steven Vartazarian
2023 Karina Lallande



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[ATTORNEY CAPTION]

Attorneys for Plaintiff

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF**

-----, on behalf of himself and on
behalf of all persons similarly situated,

Plaintiff,

v.

-----, a California Corporation; and
DOES 1 through 50, inclusive,

Defendant(s).

Case No.
CLASS ACTION
DECLARATION OF LOS ANGELES TRIAL LAWYERS CHARITIES PRESIDENT KARINA LALLANDE IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Date:
Time:
Dept:

Action Filed: -----

1 I, KARINA LALLANDE declare as follows:

2
3 1. I am President of the Los Angeles Trial Lawyers' Charities ("LATLC"). I
4 have personal knowledge of all the facts stated herein, and if called to testify as a
5 witness, I could and would competently testify to them.

6 2. I submit this declaration in support of Plaintiffs' motion for preliminary
7 approval of settlement and in support of the *cy pres* distribution to LATLC.

8 **The Proposed Settlement**

9 3. After reviewing the terms of the proposed settlement, I approve of the
10 settlement for its fairness, adequacy, and reasonableness, as well as for its
11 consideration of the public good.

12 4. The donation of the remainder of the common fund, after the deduction of
13 claims, fees, and costs, will represent a generous and beneficial gift to LATLC and
14 the underserved persons whom LATLC serves.

15 **Utilization of the Funds**

16 5. In the past, LATLC has been the *cy pres* recipient in ten wage and hour class
17 action cases, including *Espinosa v. Big Lots Settlement Fund*, Case No. CIV236538
18 (Ven. Sup. Ct. 2005); *Solis v. Hi-Tech Collision*, Case No. BC336338 (L.A. Sup. Ct.
19 2005); *Greenberg v. E-Trade Financial Corp.*, Case No. BC360152 (L.A. Sup. Ct.);
20 *Elias v. El Pollo Loco, Inc.*, Case No. BC313875 (L.A. Sup. Ct.); *Babayan v. BLS*
21 *Limousine Service*, Case No. BC418088 (L.A. Sup. Ct.); *Gutierrez v. California*
22 *Commerce Club*, Case No. BC360704 (L.A. Sup. Ct.), *Kalbaklian v. PSI Services*,
23 Case No. BC637011; *Romagnolo v LA Bite*; *Eubanks v Panther II*
24 *Transportation*, Case 1:11-CV-02705-SC; and, *Glynn Van Norton v Associated*
25 *Ready Mixed Concrete*, Case BC 648499.

1 6. As the facts below attest, the proposed *cy pres* award to LATLC is a
2 commendable utilization of unpaid residuals because it furthers the essential public
3 interest of improving the conditions of the oppressed and underserved, fighting
4 unemployment, safety, access to shelter, and opportunities, with an emphasis on
5 children and education.

6 7. In connection with this *cy pres* wage and hour award, LATLC will allocate
7 the award to specific charitable efforts specifically related to education and children's
8 services and monitor those charitable efforts to ensure the *cy pres* funds are indeed
9 utilized for the earmarked purposes.

10 8. Since it began in 2006, LATLC has donated \$3,168,421.79 to organizations
11 helping people seek employment and promoting educational and professional
12 opportunities. Specifically, \$967,356.22 was donated and provided for the following
13 programs:

- 14 a. College Scholarships: Since implementing LATLC's annual scholarship
15 program in 2015, LATLC has raised and donated \$265,000 in
16 scholarships to 96 High School Seniors who will attend college.
17 Recipients are announced at the end of each school year and the Awards
18 are sent directly to the Student's College to be deposited into the
19 winner's account.
- 20 b. Youth Sports Grants: Since 2014, LATLC has provided \$186,700 to 125
21 youth sports organizations. They not only include traditional athletic
22 organizations like little leagues and high school teams, but programs for
23 special needs athletes.
- 24 c. Adaptive tricycles: LATLC has provided 127 adaptive tricycles to
25 children and young adults with disabilities. These bikes can cost \$1,000
26 each, and many families cannot afford them. LATLC has raised and
27 donated \$124,010.14 for these adaptive tricycles.

1 d. Family Holiday Giving: Since 2016, LATLC's "Comfort & Joy" annual
2 holiday event has provided toys and groceries to families in South Los
3 Angeles, for a total cost of \$391,646.08.

4 e. Additionally, LATLC has donated \$779,545.09 to such organizations
5 as:

- 6 i. Alliance College Ready Public Schools (\$48,500.00)
- 7 ii. Blind Children's Center (\$69,850.00)
- 8 iii. City Hearts (\$51,000.00)
- 9 iv. El Nido Family Centers (\$62,195.09)
- 10 v. First Place for Youth (\$53,000.00)
- 11 vi. The Harmony Project (\$85,000.00)
- 12 vii. Imagine LA (\$84,500.00)
- 13 viii. LA LGBT Center (\$48,000.00)
- 14 ix. Team Prime Time (\$51,000.00)
- 15 x. Vista Del Mar Child & Family Services (\$112,000.00)
- 16 xi. Youth Mentoring Connection (\$114,500.00)

17 9. The *cy pres* funds would allow LATLC to continue to provide professional
18 advancement opportunities to countless underserved members of the greater Los
19 Angeles community.

20 **About LATLC**

21 10. Formed in 2006, LATLC is a California non-profit corporation and
22 501(c)(3) tax exempt organization. Donations to LATLC qualify as charitable
23 contributions under the IRS Code. This document confirms LATLC's 501(c)(3) status
24 and that donations to LATLC qualify as charitable contributions under the IRS Code.

25 11. LATLC is devoted to making a positive difference in the quality of life for
26 people within the greater Los Angeles area, focusing on issues related to children,
27 education, homelessness, survivors of abuse, and persons with disabilities. Boasting
28 over 3,000 supporters, LATLC donated in excess of \$5,558,234.00 in grants, gifts
and goods to more than 120 partner charities, including the LA Mission, Clothes the
Deal, Youth Mentoring Connection, US Vets, The Harmony Project, and LA Alliance

1 for College Ready Public Schools as well as Downtown Women's Center, Blind
2 Children's Center, Clare Foundation, Imagine LA, People's Concern (OPCC), St.
3 Anne's, The Rape Foundation, Venice Family Clinic, and Vista Del Mar Child &
4 Family Services, Inner City Law, Jewish Family Service, Toberman Neighborhood
5 Center, and Our House. As stated above, LATLC has awarded \$265,000.00 in college
6 scholarships to 96 high school seniors based on academic achievement and need.
7 LATLC's Youth Sports Program has provided \$186,700.00 in direct grants to
8 organized youth sports, including Buddy Ball for children with disabilities. In
9 addition to financial grants, LATLC participants have spent more than 9,353 hours
10 in community service since 2015 when the formal volunteer program began. In 2019,
11 only 17.0% of all funds raised went towards administrative costs. During the
12 pandemic, with revenues reduced, 28.0% of all funds raised went toward
administrative costs.

13 12. LATLC's mission is to make a positive difference in the quality of life for
14 people within the greater Los Angeles area. LATLC focuses on issues related to
15 education, children, survivors of abuse, persons with disabilities, and homelessness
16 by providing financial and other assistance to those in need throughout our
17 community. A true and correct copy of LATLC's informational flyers are attached
18 hereto as Exhibit 1, including *LATLC By The Numbers Fact Sheet, What We Do, Who*
19 *We Support, and Why We Began*.

1 13. LATLC's mission conforms to the underlying objectives and purposes of
2 the present action, as the organization strives to provide access to education,
3 children's services, employment and professional advancement.

4 ///

5 ///

6 ///

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct. This declaration was executed on _____ at ____
9 _____, California.

10 

11 _____
12 KARINA LALLANDE

13 President,

14 Los Angeles Trial Lawyers' Charities
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