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Facsimile: (415) 433-9008

15 Plaintiffs' Co-Lead Class Counsel

16
17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.
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CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF AARON DOTT IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Aaron Dott, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been actively involved in this case for over six years. I decided to join this case
8 because I felt strongly that minor league players were not being properly paid. I understood from the
9 outset that being a named plaintiff would not provide a large financial benefit to me and that there
10 was no guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed a declaration in support of Plaintiffs' Motion for Class Certification on March 4,
15 2016. I subsequently sat for a deposition in this case on June 13, 2016. I then filed my complaint in
16 intervention on February 23, 2021. Before filing my complaint, I had multiple calls with my attorneys
17 in this case and traded multiple emails. I provided information about my career, my work routines,
18 and my pay, which helped my attorneys draft my complaint and gain a better understanding of the
19 case. I also began the process of looking for employment-related documents and providing them to
20 my attorneys.

21 6. I reviewed the draft complaint before it was filed to make sure that the facts were
22 correct. I communicated with my attorneys about the draft complaint and about what the next steps
23 would be.

24 7. I estimate that this pre-filing process consumed about 20 hours of my time.

25 **Discovery**

26 8. I was the subject of extensive discovery in the case. I was served with three sets of
27 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
28

1 to discuss the requests for production and my obligation to search for and produce documents related
2 to my career.

3 9. I took this responsibility seriously. I looked for paper documents in multiple places
4 over multiple days. I estimate that I spent 20 hours looking for documents.

5 10. I also assisted my attorneys with looking for electronic documents. I met with
6 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
7 documents. This was often a tedious task that entailed several steps and many conversations over the
8 course of multiple days. It also meant that I was opening up private files so that they could be
9 searched. I allowed this to be done because I believed in the case and it was important to the success
10 of the case. I estimate that I spent six hours on this process.

11 11. Because the case lasted so long, I had to search for documents again at a later date to
12 see whether any new documents could be found. I discussed this with my attorneys over multiple
13 lengthy phone calls and spent significant time on this supplemental search process.

14 12. In total, I estimate that I spent around 30 to 40 hours performing tasks related to
15 searching for documents.

16 13. I was also served with three sets of interrogatories. I had phone calls with my
17 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
18 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
19 multiple times, and I reviewed them each time. I estimate that I spent around five hours related to
20 responding to interrogatories.

21 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
22 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
23 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
24 consumed around four hours.

25 15. I then traveled to my deposition. That took around 2 hours each way.

26 16. My deposition (including breaks) lasted around eight hours. After the deposition, I
27 reviewed the transcript to ensure it was accurate. I estimate that this took around four hours.

28 17. I estimate that the total time spent related to my deposition was around 25 hours.

Prior Declaration

18. I previously provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around three hours related to that declaration.

General Work to Stay Informed

19. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent eight hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

20. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declaration, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around 25 hours on this process.

21. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around three hours on this process.

Reputational Risks

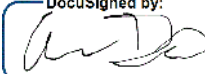
22. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

1 23. I willingly took on these risks and burdens because I felt strongly that the working
2 conditions for minor league players needed to be improved, including how players are paid. I took on
3 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
4 risks because it was the right thing to do. I am proud that I played an important role in this landmark
5 case, and am proud of the result achieved for thousands of fellow players.

6 24. In light of the above, I respectfully request an incentive award in recognition of the
7 service that I provided in the case. I believe it is warranted here because of the extensive time that I
8 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
9 way through to settlement.

10 I declare under penalty of perjury that the foregoing is true and correct.

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12 Executed on 10/19/2022 _____

13 DocuSigned by:
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15 B5593085FFB14AD... _____
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18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
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20 Plaintiffs,

21 vs.

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BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.
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CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF AARON MEADE IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Aaron Meade, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about three hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent three hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent seven hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 15 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around four hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around six hours.

23 15. I then traveled to my deposition. That took around four hours each way.

24 16. My deposition (including breaks) lasted around eight hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around two hours.

26 17. I estimate that the total time spent related to my deposition was around 25 hours.
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28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 20 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around five hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for

1 employers, both within and outside of the sports industry, to find out that I had brought this
2 employment-related case.

3 24. I willingly took on these risks and burdens because I felt strongly that the working
4 conditions for minor league players needed to be improved, including how players are paid. I took on
5 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
6 risks because it was the right thing to do. I am proud that I played an important role in this landmark
7 case, and am proud of the result achieved for thousands of fellow players.

8 25. In light of the above, I respectfully request an incentive award in recognition of the
9 service that I provided in the case. I believe it is warranted here because of the extensive time that I
10 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
11 way through to settlement.

12 I declare under penalty of perjury that the foregoing is true and correct.

13
14 Executed on 10/17/2022 _____

DocuSigned by:

Aaron Meade

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15 Plaintiffs' Co-Lead Class Counsel

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

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19 Behalf of All Those Similarly Situated,

20 Plaintiffs,

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22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF AARON SENNE IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Aaron Senne, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on February 7, 2014. Before doing so, I had multiple calls with
15 my attorneys in this case and traded multiple emails. I provided information about my career, my
16 work routines, and my pay, which helped my attorneys draft my complaint and gain a better
17 understanding of the case. I also began the process of looking for employment-related documents and
18 providing them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about 10 hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 20 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent five hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 30 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around six hours.

23 15. I then traveled to my deposition. That took around a half hour each way.

24 16. My deposition (including breaks) lasted around six and a half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around three
26 hours.

27 17. I estimate that the total time spent related to my deposition was around 20 hours.
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 80 hours on generally staying informed about what was going on in the case and discussing what would come next.

22. I participated in multiple interviews with reporters regarding this case. I had discussions with my attorneys in preparation for the interviews. I estimate that I spent around 15 hours on this process, which I believe helped make other minor league players aware of the case and the legal rights being asserted.

Trial Preparations and Settlement

23. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition

1 transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to
2 prepare to testify at trial. I estimate that I spent around 20 hours on this process.

3 24. My attorneys also communicated with me about mediation and settlement possibilities.
4 I received the settlement agreement and reviewed it before signing it. I estimate that I spent around 10
5 hours on this process.

6 Reputational Risks

7 25. As a named plaintiff in this novel, high-profile lawsuit against a well-known and
8 popular employer, I bore significant risk of harm to my reputation and my prospects for future
9 employment. Particularly because I was the first named plaintiff listed on the complaint, I knew that
10 my name would be public, and I knew that members of the baseball community would likely know
11 that I was part of the case. I also knew that it would be possible for employers, both within and
12 outside of the sports industry, to find out that I had brought this employment-related case.

13 26. I willingly took on these risks and burdens because I felt strongly that the working
14 conditions for minor league players needed to be improved, including how players are paid. I took on
15 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
16 risks because it was the right thing to do. I am proud that I played an important role in this landmark
17 case, and am proud of the result achieved for thousands of fellow players.

18 27. In light of the above, I respectfully request an incentive award in recognition of the
19 service that I provided in the case. I believe it is warranted here because of the extensive time that I
20 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
21 way through to settlement.

22 I declare under penalty of perjury that the foregoing is true and correct.

23
24 Executed on 10/21/2022 _____

25 DocuSigned by:

26 *Aaron Senne*

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28

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24 Defendants.
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CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF BARRET LOUX IN SUPPORT
 OF MOTION FOR INCENTIVE AWARDS**

1 I, Barret Loux, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been actively involved in this case for over six years. I decided to join this case
8 because I felt strongly that minor league players were not being properly paid. I understood from the
9 outset that being a named plaintiff would not provide a large financial benefit to me and that there
10 was no guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. In late 2015, I was selected by Defendants to participate in discovery as an opt-in
15 Plaintiff. I subsequently sat for an opt-in Plaintiff deposition on April 26, 2016. I later filed my
16 complaint in intervention on February 16, 2021. Before filing my complaint, I had multiple calls with
17 my attorneys in this case and traded multiple emails. I provided information about my career, my
18 work routines, and my pay, which helped my attorneys draft my complaint and gain a better
19 understanding of the case. I also began the process of looking for employment-related documents and
20 providing them to my attorneys.

21 6. I reviewed the draft complaint before it was filed to make sure that the facts were
22 correct. I communicated with my attorneys about the draft complaint and about what the next steps
23 would be.

24 7. I estimate that this pre-filing process (not including discovery when I was an opt-in)
25 consumed about three hours of my time.

26 **Discovery**

27 8. I was the subject of extensive discovery in the case, beginning when I was an opt-in
28 plaintiff. I was served with three sets of requests for production. I had numerous phone calls and

1 traded numerous emails with my attorneys to discuss the requests for production and my obligation to
2 search for and produce documents related to my career.

3 9. I took this responsibility seriously. I looked for paper documents in multiple places
4 over multiple days. I estimate that I spent two hours looking for documents.

5 10. I also assisted my attorneys with looking for electronic documents. I met with
6 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
7 documents. This was often a tedious task that entailed several steps and many conversations over the
8 course of multiple days. It also meant that I was opening up private files so that they could be
9 searched. I allowed this to be done because I believed in the case and it was important to the success
10 of the case. I estimate that I spent four hours on this process.

11 11. Because the case lasted so long, I had to search for documents again at a later date to
12 see whether any new documents could be found. I discussed this with my attorneys over multiple
13 lengthy phone calls and spent significant time on this supplemental search process.

14 12. In total, I estimate that I spent around eight hours performing tasks related to
15 searching for documents.

16 13. I was also served with four sets of interrogatories. I had phone calls with my attorneys
17 to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
18 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
19 multiple times, and I reviewed them each time. I estimate that I spent around three hours related to
20 responding to interrogatories.

21 14. I sat for two depositions in this case, first in 2016 and then again in 2021 after I
22 intervened in the case. I had multiple calls with my attorneys and exchanged messages to discuss the
23 depositions. I also had multiple prep sessions for the depositions. I reviewed documents to prepare
24 for the depositions. I estimate that the time spent preparing for the depositions consumed around five
25 hours.

26 15. I traveled to my first deposition. That took around 45 minutes each way. My second
27 deposition was taken remotely.

28

1 16. My two depositions (including breaks) lasted around seven and a half hours combined.
2 After the depositions, I reviewed the transcripts to ensure they were accurate. I estimate that this took
3 around two hours total.

4 17. I estimate that the total time spent related to my depositions was around 18 hours.

5 **18. General Work to Stay Informed**

6 19. Throughout my years of being involved in the case, I have stayed informed of the
7 progress through discussions and written communications with my counsel and review of court
8 filings. I have had regular calls and have exchanged regular messages about the case throughout. That
9 has included discussions about important filings and review of the major orders in the case. I estimate
10 that I have spent two hours on generally staying informed about what was going on in the case and
11 discussing what would come next.

12 **Trial Preparations and Settlement**

13 20. As the trial date grew closer, I began having calls and exchanging messages to discuss
14 my possible trial testimony. I began reviewing documents to prepare for it, including my deposition
15 transcripts and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to
16 testify at trial. I estimate that I spent around 11 hours on this process.

17 21. My attorneys also communicated with me about mediation and settlement possibilities.
18 I received the settlement agreement and reviewed it before signing it. I estimate that I spent around
19 one hour on this process.

20 **Reputational Risks**

21 22. As a named plaintiff in this novel, high-profile lawsuit against a well-known and
22 popular employer, I bore significant risk of harm to my reputation and my prospects for future
23 employment. I knew that my name would be public, and I knew that members of the baseball
24 community would likely know that I was part of the case. I also knew that it would be possible for
25 employers, both within and outside of the sports industry, to find out that I had brought this
26 employment-related case.

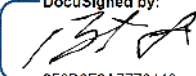
27 23. I willingly took on these risks and burdens because I felt strongly that the working
28 conditions for minor league players needed to be improved, including how players are paid. I took on

1 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
2 risks because it was the right thing to do. I am proud that I played an important role in this landmark
3 case, and am proud of the result achieved for thousands of fellow players.

4 24. In light of the above, I respectfully request an incentive award in recognition of the
5 service that I provided in the case. I believe it is warranted here because of the extensive time that I
6 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
7 way through to settlement.

8 I declare under penalty of perjury that the foregoing is true and correct.

9
10 Executed on 10/17/2022 _____

11 DocuSigned by:
12 
13 856B0F3A7773410... _____

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14
 15 Plaintiffs' Co-Lead Class Counsel

16
 17 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

18 AARON SENNE, et al., Individually and on
 19 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
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CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF BRAD MCATEE IN SUPPORT
 OF MOTION FOR INCENTIVE AWARDS**

1 I, Brad McAtee, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about eight hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent three hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent 10 hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 15 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around 10 hours.

23 15. I then traveled to my deposition. That took around three hours each way.

24 16. My deposition (including breaks) lasted around seven and a half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around two
26 hours.

27 17. I estimate that the total time spent related to my deposition was around 27 and a half
28 hours.

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 22 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around two hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around one-and-a-half hours on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball


1 community would likely know that I was part of the case. I also knew that it would be possible for
2 employers, both within and outside of the sports industry, to find out that I had brought this
3 employment-related case.

4 24. I willingly took on these risks and burdens because I felt strongly that the working
5 conditions for minor league players needed to be improved, including how players are paid. I took on
6 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
7 risks because it was the right thing to do. I am proud that I played an important role in this landmark
8 case, and am proud of the result achieved for thousands of fellow players.

9 25. In light of the above, I respectfully request an incentive award in recognition of the
10 service that I provided in the case. I believe it is warranted here because of the extensive time that I
11 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
12 way through to settlement.

13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed on 10/17/2022 _____

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15 Plaintiffs' Co-Lead Class Counsel

17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF BRAD STONE IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Brad Stone, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its
2 accuracy. I estimate that I spent around two hours related to that declaration.

3 18. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I
4 provided information to my attorneys so that they could draft this declaration. Before signing it, I
5 reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

6 **General Work to Stay Informed**

7 19. Throughout my years of being involved in the case, I have stayed informed of the
8 progress through discussions and written communications with my counsel and review of court
9 filings. I have had regular calls and have exchanged regular messages about the case throughout. That
10 has included discussions about important filings and review of the major orders in the case. I estimate
11 that I have spent 64 hours on generally staying informed about what was going on in the case and
12 discussing what would come next.

13 **Trial Preparations and Settlement**

14 20. As the trial date grew closer, I began having calls and exchanging messages to discuss
15 my possible trial testimony. I began reviewing documents to prepare for it, including my deposition
16 transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare
17 to testify at trial. I estimate that I spent around three hours on this process.

18 21. My attorneys also communicated with me about mediation and settlement possibilities.
19 I received the settlement agreement and reviewed it before signing it. I estimate that I spent around
20 one-and-a-half hours on this process.

21 **Reputational Risks**

22 22. As a named plaintiff in this novel, high-profile lawsuit against a well-known and
23 popular employer, I bore significant risk of harm to my reputation and my prospects for future
24 employment. I knew that my name would be public, and I knew that members of the baseball
25 community would likely know that I was part of the case. I also knew that it would be possible for
26 employers, both within and outside of the sports industry, to find out that I had brought this
27 employment-related case.

28

24. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

Executed on 10/19/2022

886F242F47BD4AA.

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15 Plaintiffs' Co-Lead Class Counsel
 16

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
 25
 26
 27
 28

CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF BRANDON HENDERSON IN
 SUPPORT OF MOTION FOR INCENTIVE
 AWARDS**

1 I, Brandon Henderson, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about eight hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 12 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent four hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 20 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around three hours.

23 15. I then traveled to my deposition. That took around three hours each way.

24 16. My deposition (including breaks) lasted around five hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around four hours.

26 17. I estimate that the total time spent related to my deposition was around 20 hours.
27
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 20 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around five hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022

DocuSigned by:

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Plaintiffs' Co-Lead Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF BRANDON PINCKNEY IN
SUPPORT OF MOTION FOR INCENTIVE
AWARDS**

1 I, Brandon Pinckney, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over seven years. I decided to join this case because
8 I felt strongly that minor league players were not being properly paid. I understood from the outset
9 that being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on May 20, 2015. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about six hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.
28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent two hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent five hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 10 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around 12 hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around eight hours.

23 15. I then traveled to my deposition. That took around one-and-a-half hours each way.
24 The night before my deposition, I had to stay in a hotel in San Francisco. Because of my deposition, I
25 missed two evenings of giving pitching lessons for which I was not compensated.

26 16. My deposition (including breaks) lasted around eight-and-a-half hours. After the
27 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around four
28 hours.

1 17. I estimate that the total time spent related to my deposition was around 25 hours.

2 **Prior Declarations**

3 18. I previously provided a declaration in support of Plaintiffs' memorandum regarding
4 personal jurisdiction and venue. I provided information to my attorneys so that they could draft this
5 declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two
6 hours related to that declaration.

7 19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class
8 and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my
9 attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its
10 accuracy. I estimate that I spent around two hours related to that declaration.

11 20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I
12 provided information to my attorneys so that they could draft this declaration. Before signing it, I
13 reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

14 **General Work to Stay Informed**

15 21. Throughout my years of being involved in the case, I have stayed informed of the
16 progress through discussions and written communications with my counsel and review of court
17 filings. I have had regular calls and have exchanged regular messages about the case throughout. That
18 has included discussions about important filings and review of the major orders in the case. I estimate
19 that I have spent 20 hours on generally staying informed about what was going on in the case and
20 discussing what would come next.

21 **Trial Preparations and Settlement**

22 22. As the trial date grew closer, I began having calls and exchanging messages to discuss
23 my possible trial testimony. I began reviewing documents to prepare for it, including my deposition
24 transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to
25 prepare to testify at trial. I estimate that I spent around 15 hours on this process.

26 23. My attorneys also communicated with me about mediation and settlement possibilities.
27 I received the settlement agreement and reviewed it before signing it. I estimate that I spent around
28 two hours on this process.

Reputational Risks

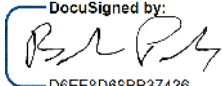
24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022

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15 Plaintiffs' Co-Lead Class Counsel
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17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
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CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF BRETT NEWSOME IN
 SUPPORT OF MOTION FOR INCENTIVE
 AWARDS**

1 I, Brett Newsome, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on April 21, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about three hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 12 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent seven hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 20 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around seven hours.

23 15. I then traveled to my deposition. That took around one hour each way.

24 16. My deposition (including breaks) lasted around seven hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around four hours.

26 17. I estimate that the total time spent related to my deposition was around 20 hours.
27
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 24 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around 20 hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around one hour on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball

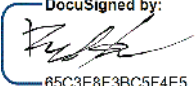
1 community would likely know that I was part of the case. I also knew that it would be possible for
2 employers, both within and outside of the sports industry, to find out that I had brought this
3 employment-related case.

4 24. I willingly took on these risks and burdens because I felt strongly that the working
5 conditions for minor league players needed to be improved, including how players are paid. I took on
6 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
7 risks because it was the right thing to do. I am proud that I played an important role in this landmark
8 case, and am proud of the result achieved for thousands of fellow players.

9 25. In light of the above, I respectfully request an incentive award in recognition of the
10 service that I provided in the case. I believe it is warranted here because of the extensive time that I
11 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
12 way through to settlement.

13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed on 10/17/2022 _____

16 DocuSigned by:
17 
18 65C3E8E3BC5F4E5... _____

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15 Plaintiffs' Co-Lead Class Counsel
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17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
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CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF BRYAN HENRY IN SUPPORT
 OF MOTION FOR INCENTIVE AWARDS**

1 I, Bryan Henry, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over approximately a year and a half. I decided to
8 join this case because I felt strongly that minor league players were not being properly paid. I
9 understood from the outset that being a named plaintiff would not provide a large financial benefit to
10 me and that there was no guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my motion to intervene on April 22, 2021. I subsequently filed my complaint in
15 intervention on May 11, 2021. Before filing my complaint, I had multiple calls with my attorneys in
16 this case and traded multiple emails. I provided information about my career, my work routines, and
17 my pay, which helped my attorneys draft my complaint and gain a better understanding of the case. I
18 also began the process of looking for employment-related documents and providing them to my
19 attorneys.

20 6. I reviewed the draft complaint before it was filed to make sure that the facts were
21 correct. I communicated with my attorneys about the draft complaint and about what the next steps
22 would be.

23 7. I estimate that this pre-filing process consumed about five hours of my time.

24 **Discovery**

25 8. I was the subject of extensive discovery in the case. I was served with one set of
26 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
27 to discuss the requests for production and my obligation to search for and produce documents related
28 to my career.

1 has included discussions about important filings and review of the major orders in the case. I estimate
2 that I have spent 30 hours on generally staying informed about what was going on in the case and
3 discussing what would come next.

4 **Trial Preparations and Settlement**

5 18. As the trial date grew closer, I began having calls and exchanging messages to discuss
6 my possible trial testimony. I began reviewing documents to prepare for it, including my deposition
7 transcript and interrogatory answers. I had a prep session with my attorneys to prepare to testify at
8 trial. I estimate that I spent around three hours on this process.

9 19. My attorneys also communicated with me about mediation and settlement possibilities.
10 I received the settlement agreement and reviewed it before signing it. I estimate that I spent around
11 three hours on this process.

12 **Reputational Risks**

13 20. As a named plaintiff in this novel, high-profile lawsuit against a well-known and
14 popular employer, I bore significant risk of harm to my reputation and my prospects for future
15 employment. I knew that my name would be public, and I knew that members of the baseball
16 community would likely know that I was part of the case. I also knew that it would be possible for
17 employers, both within and outside of the sports industry, to find out that I had brought this
18 employment-related case.

19 21. I willingly took on these risks and burdens because I felt strongly that the working
20 conditions for minor league players needed to be improved, including how players are paid. I took on
21 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
22 risks because it was the right thing to do. I am proud that I played an important role in this landmark
23 case, and am proud of the result achieved for thousands of fellow players.

24 22. In light of the above, I respectfully request an incentive award in recognition of the
25 service that I provided in the case. I believe it is warranted here because of the extensive time that I
26 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
27 way through to settlement.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022

DocuSigned by:
Bryan Henry
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15 Plaintiffs' Co-Lead Class Counsel
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17 **UNITED STATES DISTRICT COURT**
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19 AARON SENNE, et al., Individually and on
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20 Plaintiffs,

21 vs.

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 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
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CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF CODY SEDLOCK IN
 SUPPORT OF MOTION FOR INCENTIVE
 AWARDS**

1 I, Cody Sedlock, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been actively involved in this case for over two years. I decided to join this case
8 because I felt strongly that minor league players were not being properly paid. I understood from the
9 outset that being a named plaintiff would not provide a large financial benefit to me and that there
10 was no guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint in intervention on February 23, 2021. Before doing so, I had
15 multiple calls with my attorneys in this case and traded multiple emails. I provided information about
16 my career, my work routines, and my pay, which helped my attorneys draft my complaint and gain a
17 better understanding of the case. I also began the process of looking for employment-related
18 documents and providing them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about four hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

28

1 Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related
2 to that declaration.

3 **General Work to Stay Informed**

4 18. Throughout my involvement in the case, I have stayed informed of the progress
5 through discussions and written communications with my counsel and review of court filings. I have
6 had regular calls and have exchanged regular messages about the case throughout. That has included
7 discussions about important filings and review of the major orders in the case. I estimate that I have
8 spent eight hours on generally staying informed about what was going on in the case and discussing
9 what would come next.

10 **Trial Preparations and Settlement**

11 19. As the trial date grew closer, I began having calls and exchanging messages to discuss
12 my possible trial testimony. I began reviewing documents to prepare for it, including my deposition
13 transcript, declaration, and interrogatory answers. I had multiple prep sessions with my attorneys to
14 prepare to testify at trial. I estimate that I spent around 23 hours on this process.

15 20. My attorneys also communicated with me about mediation and settlement possibilities.
16 I received the settlement agreement and reviewed it before signing it. I estimate that I spent around
17 two and a half hours on this process.

18 **Reputational Risks**

19 21. As a named plaintiff in this novel, high-profile lawsuit against a well-known and
20 popular employer, I bore significant risk of harm to my reputation and my prospects for future
21 employment. I knew that my name would be public, and I knew that members of the baseball
22 community would likely know that I was part of the case. I also knew that it would be possible for
23 employers, both within and outside of the sports industry, to find out that I had brought this
24 employment-related case.

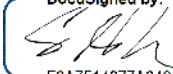
25 22. I willingly took on these risks and burdens because I felt strongly that the working
26 conditions for minor league players needed to be improved, including how players are paid. I took on
27 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
28

1 risks because it was the right thing to do. I am proud that I played an important role in this landmark
2 case, and am proud of the result achieved for thousands of fellow players.

3 23. In light of the above, I respectfully request an incentive award in recognition of the
4 service that I provided in the case. I believe it is warranted here because of the extensive time that I
5 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
6 way through to settlement.

7 I declare under penalty of perjury that the foregoing is true and correct.

8
9 Executed on 10/17/2022 _____

10 DocuSigned by:
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12 F9A7514877A2491... _____
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15 Plaintiffs' Co-Lead Class Counsel

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

18 AARON SENNE, et al., Individually and on
19 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF CRAIG BENNIGSON IN
SUPPORT OF MOTION FOR INCENTIVE
AWARDS**

1 I, Craig Bennigson, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about three hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent two hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent four hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 10 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around six hours.

23 15. I then traveled to my deposition. That took around one hour each way.

24 16. My deposition (including breaks) lasted around eight hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around one hour.

26 17. I estimate that the total time spent related to my deposition was around 20 hours.
27
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 30 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around 12 hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around three hours on this process.

Reputational Risks

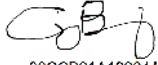
24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022

DocuSigned by:

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Plaintiffs' Co-Lead Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF DANIEL BRITT IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Daniel Britt, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on April 21, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about 10 hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.
28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent ten hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent 3 hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 15 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around three hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around five hours.

23 15. I then traveled to my deposition. That took around three hours each way.

24 16. My deposition (including breaks) lasted around six hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around five hours.

26 17. I estimate that the total time spent related to my deposition was around 22 hours.

27

28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 25 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around 15 hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around four hours on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball

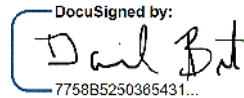
1 community would likely know that I was part of the case. I also knew that it would be possible for
2 employers, both within and outside of the sports industry, to find out that I had brought this
3 employment-related case.

4 24. I willingly took on these risks and burdens because I felt strongly that the working
5 conditions for minor league players needed to be improved, including how players are paid. I took on
6 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
7 risks because it was the right thing to do. I am proud that I played an important role in this landmark
8 case, and am proud of the result achieved for thousands of fellow players.

9 25. In light of the above, I respectfully request an incentive award in recognition of the
10 service that I provided in the case. I believe it is warranted here because of the extensive time that I
11 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
12 way through to settlement.

13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed on 10/17/2022 _____

16 DocuSigned by:
17  _____
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15 Plaintiffs' Co-Lead Class Counsel
 16

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
 25
 26
 27
 28

CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF DAVID QUINOWSKI IN
 SUPPORT OF MOTION FOR INCENTIVE
 AWARDS**

1 I, David Quinowski, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over seven years. I decided to join this case because
8 I felt strongly that minor league players were not being properly paid. I understood from the outset
9 that being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on May 20, 2015. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about four hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.
28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent two hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent one hour on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around five hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around three hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I traveled to
21 my deposition prep. That took around one and a half hours each way. I reviewed documents to
22 prepare for the deposition. I estimate that the time spent preparing for the deposition consumed
23 around five and a half hours.

24 15. I then traveled to my deposition. That took around three hours each way.

25 16. My deposition (including breaks) lasted around nine hours. After the deposition, I
26 reviewed the transcript to ensure it was accurate. I estimate that this took around two hours.

27 17. I estimate that the total time spent related to my deposition was around 25 hours.
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 21 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around three hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around one and a half hours on this process.

Reputational Risks

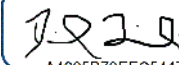
24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022

DocuSigned by:

A4625B73EEC5447...

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15 Plaintiffs' Co-Lead Class Counsel
16

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.
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CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF DUSTIN PEASE IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Dustin Pease, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about three hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent three hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent two hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around ten hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around ten hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around three and a half hours.

23 15. I then traveled to my deposition. That took around one hour each way.

24 16. My deposition (including breaks) lasted around eight-and-a-half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around two
26 hours.

27 17. I estimate that the total time spent related to my deposition was around 16-and-a-half
28 hours.

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 25 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around two hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around an hour and a half on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball

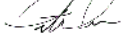
1 community would likely know that I was part of the case. I also knew that it would be possible for
2 employers, both within and outside of the sports industry, to find out that I had brought this
3 employment-related case.

4 24. I willingly took on these risks and burdens because I felt strongly that the working
5 conditions for minor league players needed to be improved, including how players are paid. I took on
6 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
7 risks because it was the right thing to do. I am proud that I played an important role in this landmark
8 case, and am proud of the result achieved for thousands of fellow players.

9 25. In light of the above, I respectfully request an incentive award in recognition of the
10 service that I provided in the case. I believe it is warranted here because of the extensive time that I
11 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
12 way through to settlement.

13 I declare under penalty of perjury that the foregoing is true and correct.

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15 Executed on 10/19/2022 _____

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18 ED1D794B88ED4A2... _____
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15 Plaintiffs' Co-Lead Class Counsel

17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

18 AARON SENNE, et al., Individually and on
19 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
23 BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
24 BASEBALL, et al.,

25 Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF GASPAR SANTIAGO IN
SUPPORT OF MOTION FOR INCENTIVE
AWARDS**

1 I, Gaspar Santiago, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over seven years. I decided to join this case because
8 I felt strongly that minor league players were not being properly paid. I understood from the outset
9 that being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on May 20, 2015. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about 10 to 12 hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around five to six hours performing tasks related to
13 searching for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around three hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had a prep session for the deposition. I reviewed documents
21 to prepare for the deposition. I estimate that the time spent preparing for the deposition consumed
22 around two to four hours.

23 15. I then traveled to my deposition. That took around 45 minutes each way.

24 16. My deposition (including breaks) lasted around eight hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around three hours.

26 17. I estimate that the total time spent related to my deposition was around 16 and a half
27 hours.

28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 15 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around an hour and a half on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around 30 minutes on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for

1 employers, both within and outside of the sports industry, to find out that I had brought this
2 employment-related case.

3 24. I willingly took on these risks and burdens because I felt strongly that the working
4 conditions for minor league players needed to be improved, including how players are paid. I took on
5 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
6 risks because it was the right thing to do. I am proud that I played an important role in this landmark
7 case, and am proud of the result achieved for thousands of fellow players.

8 25. In light of the above, I respectfully request an incentive award in recognition of the
9 service that I provided in the case. I believe it is warranted here because of the extensive time that I
10 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
11 way through to settlement.

12 I declare under penalty of perjury that the foregoing is true and correct.

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14 Executed on _____

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15 Abogado colíder del grupo de demandantes

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18 **TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS**
19 **DISTRITO NORTE DE CALIFORNIA, DIVISIÓN DE SAN FRANCISCO**

20 AARON SENNE, y otros, individualmente y
en nombre de todos los que están en
situación similar,

21 Demandantes,

22 vs.

23 OFICINA DEL COMISIONADO DE
24 BÉISBOL, una asociación no incorporada
que hace negocios como GRANDES LIGAS
25 DE BÉISBOL, y otros, y que se encuentra en
el proceso de selección,

26 Demandados.
27
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CASO NÚMERO 3:14-cv-00608-JCS
(consolidado con 3:14-cv-03289-JCS)

DEMANDA JUDICIAL COLECTIVA

**DECLARACIÓN DE GASPAR SANTIAGO EN
APOYO DE LA MOTIÓN PARA LA CONCESIÓN DE
INCENTIVOS**

1 I, Gaspar Santiago, por la presente declara lo siguiente:

2 1. Soy uno de los demandantes nombrados en este caso. Presento esta Declaración en
3 apoyo de la Moción de los Demandantes para la concesión de incentivos.

4 2. Conozco personalmente los hechos expuestos en esta Declaración. En caso de ser
5 llamado como testigo, podría testificar, y lo haría de forma competente, sobre los asuntos aquí
6 expuestos.

7 **Decisión y esfuerzo para sumarse a la demanda**

8 3. He sido parte de este caso durante más de siete años. Decidí sumarme a este caso
9 porque me parecía que los jugadores de las ligas menores no recibían una remuneración adecuada.
10 Comprendí desde el principio que ser un demandante nombrado no me proporcionaría un gran
11 beneficio financiero y que no había garantía de éxito.

12 4. A pesar de ello, me incorporé al caso y le dediqué mucho tiempo. Era un tiempo que
13 podía haber dedicado a otros menesteres, con mi familia y amigos o con el trabajo. En cambio, lo
14 dediqué a garantizar el mejor resultado posible para todos mis colegas de las ligas menores.

15 5. Presenté mi denuncia el 20 de mayo de 2015. Antes de hacerlo, tuve múltiples
16 llamadas con mis abogados en este caso e intercambié múltiples correos electrónicos. Proporcioné
17 información sobre mi carrera, mis rutinas de trabajo y mi salario, lo que ayudó a mis abogados a
18 redactar mi demanda y a comprender mejor el caso. También comencé el proceso de búsqueda de
19 documentos relacionados con el empleo y los proporcioné a mis abogados.

20 6. Revisé el proyecto de denuncia antes de presentarlo para asegurarme de que los
21 hechos eran correctos. Me comuniqué con mis abogados sobre el proyecto de denuncia y sobre cuáles
22 serían los siguientes pasos.

23 7. Calculo que este proceso previo a la presentación consumió entre 10 y 12 horas de mi
24 tiempo.

25 **Descubrimiento**

26 8. Fui objeto de un amplio proceso de investigación en el caso. Se me entregaron dos
27 series de solicitudes de producción. Tuve numerosas llamadas telefónicas e intercambié numerosos
28

1 correos electrónicos con mis abogados para discutir las solicitudes de presentación y mi obligación de
2 buscar y presentar documentos relacionados con mi carrera.

3 9. Me tomé muy en serio esta responsabilidad. Busqué documentos en papel en muchos
4 lugares durante varios días.

5 10. También asistí a mis abogados en la búsqueda de documentos electrónicos. Me reuní
6 con miembros del equipo de mis abogados o con un proveedor contratado por ellos para que me
7 ayudara a recopilar los documentos electrónicos. A menudo era una tarea tediosa que implicaba varios
8 pasos y muchas conversaciones a lo largo de varios días. También significaba que estaba abriendo
9 archivos privados para que pudieran ser buscados. Lo permití porque creía en el caso y era importante
10 para el éxito del mismo.

11 11. Como el caso duró tanto tiempo, tuve que volver a buscar los documentos en una
12 fecha posterior para ver si se podía encontrar algún documento nuevo. Lo discutí con mis abogados
13 en múltiples y largas llamadas telefónicas y dediqué mucho tiempo a este proceso de búsqueda
14 complementaria.

15 12. En total, estimo que pasé entre cinco y seis horas realizando tareas relacionadas con la
16 búsqueda de documentos.

17 13. También se me entregaron tres juegos de interrogatorios. Tuve llamadas telefónicas
18 con mis abogados para discutir estos interrogatorios y las respuestas, y también intercambié correos
19 electrónicos. He revisado las respuestas al interrogatorio para asegurarme de su exactitud. Las
20 respuestas a mis interrogatorios fueron modificadas varias veces, y las revisé cada vez. Calculo que
21 pasé unas tres horas relacionadas con la respuesta a los interrogatorios.

22 14. Me senté para una declaración en este caso. Tuve múltiples llamadas con mis abogados
23 e intercambié mensajes para discutir la declaración. También tuve una sesión de preparación para la
24 declaración. Revisé los documentos para preparar la declaración. Calculo que el tiempo dedicado a la
25 preparación de la declaración consumió entre dos y cuatro horas.

26 15. Luego viajé a mi declaración. Eso llevó unos 45 minutos en cada sentido.
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17. Calculo que el tiempo total dedicado a mi declaración fue de unas 16 horas y media.

18. Anteriormente proporcioné una declaración en apoyo de la Moción de los Demandantes para la Notificación a la Clase y la Certificación Condicional de conformidad con la Ley de Normas Laborales Justas. Proporcioné información a mis abogados para que pudieran redactar esta declaración. Antes de firmarlo, lo revisé para asegurarme de su exactitud. Calculo que pasé alrededor de una hora relacionada con esa declaración.

19. También proporcioné una declaración en apoyo de la Moción de los Demandantes para la Certificación de la Clase. Proporcioné información a mis abogados para que pudieran redactar esta declaración. Antes de firmarlo, lo revisé para asegurarme de su exactitud. Calculo que pasé alrededor de una hora relacionada con esa declaración.

20. A lo largo de mis años de participación en el caso, me he mantenido informado del progreso a través de discusiones y comunicaciones escritas con mi abogado y la revisión de los archivos del tribunal. He recibido llamadas periódicas y he intercambiado mensajes regulares sobre el caso en todo momento. Esto ha incluido discusiones sobre importantes presentaciones y la revisión de las principales órdenes del caso. Calculo que he dedicado 15 horas a mantenerme informado en general de lo que ocurría en el caso y a discutir lo que vendría después.

21. A medida que se acercaba la fecha del juicio, empecé a recibir llamadas y a intercambiar mensajes para hablar de mi posible testimonio en el juicio. Empecé a revisar los documentos para prepararme, incluyendo la transcripción de mi declaración, las declaraciones y las respuestas a los interrogatorios. Tuve una sesión de preparación con mis abogados para prepararme para testificar en el juicio. Calculo que he invertido alrededor de una hora y media en este proceso.

22. Mis abogados también se comunicaron conmigo sobre la mediación y las posibilidades de acuerdo. Recibí el acuerdo de conciliación y lo revisé antes de firmarlo. Calculo que he invertido unos 30 minutos en este proceso.

Riesgos para la reputación

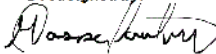
23. Como demandante nombrado en este novedoso y destacado pleito contra un empleador muy conocido y popular, corría un riesgo significativo de dañar mi reputación y mis perspectivas de empleo en el futuro. Sabía que mi nombre sería público, y sabía que los miembros de la comunidad del béisbol probablemente sabrían que yo formaba parte del caso. También sabía que era posible que los empleadores, tanto dentro como fuera de la industria del deporte, se enteraran de que había presentado este caso relacionado con el empleo.

24. Asumí de buen grado estos riesgos y cargas porque estaba convencido de que había que mejorar las condiciones de trabajo de los jugadores de las ligas menores, incluida la forma de pagar a los jugadores. Asumí la carga de abrirme a un descubrimiento intrusivo y prolongado y a la posibilidad de riesgos para la reputación porque era lo correcto. Estoy orgulloso de haber desempeñado un papel importante en este caso histórico, y estoy orgulloso del resultado obtenido para miles de compañeros.

25. En vista de lo anterior, solicito respetuosamente un premio de incentivo en reconocimiento del servicio que presté en el caso. Creo que se justifica en este caso por el tiempo que he dedicado a este largo, muy publicitado y polémico caso, y por mi compromiso de llevarlo hasta el final.

Declaro bajo pena de perjurio que lo anterior es cierto y correcto.

Ejecutado en 10/25/2022

DocuSigned by:

23AD8E4EFDAB403...



Certified Translation

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Salt Lake City, UT 84101
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inWhatLanguage, a professional translation firm, hereby declares that in our professional opinion and to the best of our knowledge and belief, the attached Declaration documents was translated from English to Spanish by a native-speaking inWhatLanguage linguist and is a faithful and accurate translation.

The translation work was provided by resources vetted and qualified as United States citizens performing the work within the United States of America.

The translator besides meeting the residency and citizenship criteria has also been established, through testing, to be a competent professional translator and the work has been subject to a review and edit by an independent and similarly qualified editor fluent in both languages

Name: Amanda Jean Best

Signature:

Title: Office Manager

Date: 10/20/2022

State of Utah, County of Salt Lake On this 20th day of October, in the year 2022, before me, Jacqueline Rodriguez Pinon, a notary public, personally appeared, Amanda Jean Best, proved on the basis of satisfactory evidence to be the person(s) whose name is subscribed to this instrument, and acknowledged he/she executed the same.

Witness my hand and official seal.

Notary Name Jacqueline Rodriguez Pinon Signature



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15 Plaintiffs' Co-Lead Class Counsel
 16

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
 25
 26
 27
 28

CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF GRANT DUFF IN SUPPORT
 OF MOTION FOR INCENTIVE AWARDS**

1 I, Grant Duff, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over seven years. I decided to join this case because
8 I felt strongly that minor league players were not being properly paid. I understood from the outset
9 that being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on May 20, 2015. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about three hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.
28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent three hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent three hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around eight hours performing tasks related to
13 searching for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around four and a half hours
18 related to responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around five hours.

23 15. I then traveled to my deposition. That took around six hours each way.

24 16. My deposition (including breaks) lasted around eight hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around two hours.

26 17. I estimate that the total time spent related to my deposition was around 30 hours.
27
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 14 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around six hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around one and a half hours on this process.

Reputational Risks

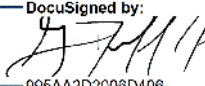
24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022

DocuSigned by:

995AA2D2006D406...

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15 Plaintiffs' Co-Lead Class Counsel
 16

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
 25
 26
 27
 28

CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF JAKE KAHAULELIO IN
 SUPPORT OF MOTION FOR INCENTIVE
 AWARDS**

1 I, Jake Kahaulelio, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about four hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.
28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent ten hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent two hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 15 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around two hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around five and a half hours.

23 15. I then traveled to my deposition. That took around one-and-a-half hours each way.

24 16. My deposition (including breaks) lasted around nine hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around one hour.

26 17. I estimate that the total time spent related to my deposition was around 20 hours.

27

28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 30 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around 20 hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around one-and-a-half hours on this process.

Reputational Risks

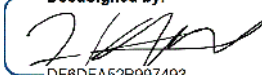
24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022 _____

DocuSigned by:

DF8DFA52B997493... _____

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Plaintiffs' Co-Lead Class Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF JEFF NADEAU IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Jeff Nadeau, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about 10 hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its
2 accuracy. I estimate that I spent around two and a half hours related to that declaration.

3 **General Work to Stay Informed**

4 18. Throughout my years of being involved in the case, I have stayed informed of the
5 progress through discussions and written communications with my counsel and review of court
6 filings. I have had regular calls and have exchanged regular messages about the case throughout. That
7 has included discussions about important filings and review of the major orders in the case. I estimate
8 that I have spent 25 hours on generally staying informed about what was going on in the case and
9 discussing what would come next.

10 **Trial Preparations and Settlement**

11 19. As the trial date grew closer, I began having calls and exchanging messages to discuss
12 my possible trial testimony. I began reviewing documents to prepare for it, including my deposition
13 transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare
14 to testify at trial. I estimate that I spent around five hours on this process.

15 20. My attorneys also communicated with me about mediation and settlement possibilities.
16 I received the settlement agreement and reviewed it before signing it. I estimate that I spent around
17 three hours on this process.

18 **Reputational Risks**

19 21. As a named plaintiff in this novel, high-profile lawsuit against a well-known and
20 popular employer, I bore significant risk of harm to my reputation and my prospects for future
21 employment. I knew that my name would be public, and I knew that members of the baseball
22 community would likely know that I was part of the case. I also knew that it would be possible for
23 employers, both within and outside of the sports industry, to find out that I had brought this
24 employment-related case.

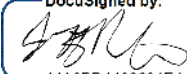
25 22. I willingly took on these risks and burdens because I felt strongly that the working
26 conditions for minor league players needed to be improved, including how players are paid. I took on
27 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
28

1 risks because it was the right thing to do. I am proud that I played an important role in this landmark
2 case, and am proud of the result achieved for thousands of fellow players.

3 23. In light of the above, I respectfully request an incentive award in recognition of the
4 service that I provided in the case. I believe it is warranted here because of the extensive time that I
5 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
6 way through to settlement.

7 I declare under penalty of perjury that the foregoing is true and correct.

8
9 Executed on 10/19/2022 _____

10 DocuSigned by:
11 
12 44A9BD4433804E4... _____

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15 Plaintiffs' Co-Lead Class Counsel
16

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

18 AARON SENNE, et al., Individually and on
19 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.
25
26
27
28

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF JOEL WEEKS IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Joel Weeks, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over seven years. I decided to join this case because
8 I felt strongly that minor league players were not being properly paid. I understood from the outset
9 that being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on May 20, 2015. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 25 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent three and a half hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 30 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around four hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around six hours.

23 15. My deposition (including breaks) lasted around eight hours. After the deposition, I
24 reviewed the transcript to ensure it was accurate. I estimate that this took around one and a half
25 hours.

26 16. I estimate that the total time spent related to my deposition was around 17 and a half
27 hours.

28

Prior Declarations

17. I previously provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

18. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

19. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 15 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

20. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around two hours on this process.

21. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

22. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball


1 community would likely know that I was part of the case. I also knew that it would be possible for
2 employers, both within and outside of the sports industry, to find out that I had brought this
3 employment-related case.

4 23. I willingly took on these risks and burdens because I felt strongly that the working
5 conditions for minor league players needed to be improved, including how players are paid. I took on
6 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
7 risks because it was the right thing to do. I am proud that I played an important role in this landmark
8 case, and am proud of the result achieved for thousands of fellow players.

9 24. In light of the above, I respectfully request an incentive award in recognition of the
10 service that I provided in the case. I believe it is warranted here because of the extensive time that I
11 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
12 way through to settlement.

13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed on 10/19/2022 _____

16 DocuSigned by:
17 
18 C3213CC50581479... _____

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15 Plaintiffs' Co-Lead Class Counsel
 16

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
 25
 26
 27
 28

CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF JON GASTON IN SUPPORT
 OF MOTION FOR INCENTIVE AWARDS**

1 I, Jon Gaston, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about three hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent six hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent three hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 10 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had a prep session for the deposition. I reviewed documents
21 to prepare for the deposition. I estimate that the time spent preparing for the deposition consumed
22 around three hours.

23 15. I then traveled to my deposition. That took around five hours each way.

24 16. My deposition (including breaks) lasted around eight-and-a-half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around two
26 hours.

27 17. I estimate that the total time spent related to my deposition was around 25 hours.
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 15 to 20 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around nine hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for

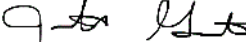
1 employers, both within and outside of the sports industry, to find out that I had brought this
2 employment-related case.

3 24. I willingly took on these risks and burdens because I felt strongly that the working
4 conditions for minor league players needed to be improved, including how players are paid. I took on
5 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
6 risks because it was the right thing to do. I am proud that I played an important role in this landmark
7 case, and am proud of the result achieved for thousands of fellow players.

8 25. In light of the above, I respectfully request an incentive award in recognition of the
9 service that I provided in the case. I believe it is warranted here because of the extensive time that I
10 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
11 way through to settlement.

12 I declare under penalty of perjury that the foregoing is true and correct.

13
14 Executed on 10/17/2022 _____

15 DocuSigned by:
16 
17 BD860349B3624EC... _____

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15 Plaintiffs' Co-Lead Class Counsel

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

18 AARON SENNE, et al., Individually and on
19 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF JOSEPH NEWBY IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Joseph Newby, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on April 21, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about 10 hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 25 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent six hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 35 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around nine hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around five hours.

23 15. I then traveled to my deposition. That took around one and a half hours each way. On
24 the day of my deposition, I missed a day of work for which I was not compensated.

25 16. My deposition (including breaks) lasted around three and a half hours. After the
26 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around an
27 hour.

28 17. I estimate that the total time spent related to my deposition was around 15 hours.

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 30 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around three hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around one hour on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball

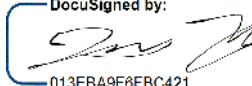
1 community would likely know that I was part of the case. I also knew that it would be possible for
2 employers, both within and outside of the sports industry, to find out that I had brought this
3 employment-related case.

4 24. I willingly took on these risks and burdens because I felt strongly that the working
5 conditions for minor league players needed to be improved, including how players are paid. I took on
6 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
7 risks because it was the right thing to do. I am proud that I played an important role in this landmark
8 case, and am proud of the result achieved for thousands of fellow players.

9 25. In light of the above, I respectfully request an incentive award in recognition of the
10 service that I provided in the case. I believe it is warranted here because of the extensive time that I
11 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
12 way through to settlement.

13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed on 10/18/2022 _____

16 DocuSigned by:
17 
013EBA9F8FBC421... _____

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Plaintiffs' Co-Lead Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

AARON SENNE, et al., Individually and on
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Plaintiffs,

vs.

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BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF JUSTIN MURRAY IN
SUPPORT OF MOTION FOR INCENTIVE
AWARDS**

1 I, Justin Murray, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about six hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 10 hours looking for paper documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent eight hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 20 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around eight hours.

23 15. I then traveled to my deposition. That took around six and a half hours each way.

24 16. My deposition (including breaks) lasted around eight hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around three hours.

26 17. I estimate that the total time spent related to my deposition was around 35 hours.
27
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one and a half hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one and a half hours related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 20 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around three hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball

1 community would likely know that I was part of the case. I also knew that it would be possible for
2 employers, both within and outside of the sports industry, to find out that I had brought this
3 employment-related case.

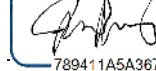
4 24. I willingly took on these risks and burdens because I felt strongly that the working
5 conditions for minor league players needed to be improved, including how players are paid. I took on
6 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
7 risks because it was the right thing to do. I am proud that I played an important role in this landmark
8 case, and am proud of the result achieved for thousands of fellow players.

9 25. In light of the above, I respectfully request an incentive award in recognition of the
10 service that I provided in the case. I believe it is warranted here because of the extensive time that I
11 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
12 way through to settlement.

13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed on 10/17/2022 _____

16 DocuSigned by:

17 

18 789411A5A367421... _____

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15 Plaintiffs' Co-Lead Class Counsel

17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF KRIS WATTS IN SUPPORT OF
MOTION FOR INCENTIVE AWARDS**

1 I, Kris Watts, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on April 21, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about two hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.
28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent four hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I sent my cell
4 phone to my attorneys' team to assist in the collection of electronic documents. This was often a
5 tedious task that entailed several steps and many conversations over the course of multiple days. It
6 also meant that I was opening up private files so that they could be searched. I allowed this to be done
7 because I believed in the case and it was important to the success of the case. I estimate that I spent
8 four hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 10 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around five hours.

23 15. I then traveled to my deposition. That took around one hour and 15 minutes each
24 way.

25 16. My deposition (including breaks) lasted around eight and a half hours. After the
26 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around two
27 hours.

28 17. I estimate that the total time spent related to my deposition was around 18 hours.

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 30 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around six hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks


24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022

DocuSigned by:

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 3 MARC A. WALLENSTEIN (*pro hac vice*)
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15 Plaintiffs' Co-Lead Class Counsel
 16

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
 25
 26
 27
 28

CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF KYLE JOHNSON IN SUPPORT
 OF MOTION FOR INCENTIVE AWARDS**

1 I, Kyle Johnson, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been actively involved in this case for over six years. I decided to join this case
8 because I felt strongly that minor league players were not being properly paid. I understood from the
9 outset that being a named plaintiff would not provide a large financial benefit to me and that there
10 was no guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed a motion to intervene and provided a declaration in support of Class
15 Certification and Motion to Intervene on September 14, 2016. I subsequently filed my complaint in
16 intervention on February 23, 2021. Before filing my complaint, I had multiple calls with my attorneys
17 in this case and traded multiple emails. I provided information about my career, my work routines,
18 and my pay, which helped my attorneys draft my complaint and gain a better understanding of the
19 case. I also began the process of looking for employment-related documents and providing them to
20 my attorneys.

21 6. I reviewed the draft complaint before it was filed to make sure that the facts were
22 correct. I communicated with my attorneys about the draft complaint and about what the next steps
23 would be.

24 7. I estimate that this pre-filing process consumed about 10 hours of my time.

25 **Discovery**

26 8. I was the subject of extensive discovery in the case. I was served with two sets of
27 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
28

1 to discuss the requests for production and my obligation to search for and produce documents related
2 to my career.

3 9. I took this responsibility seriously. I looked for paper documents in multiple places
4 over multiple days. I estimate that I spent 10 hours looking for documents.

5 10. I also assisted my attorneys with looking for electronic documents. I met with
6 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
7 documents. This was often a tedious task that entailed several steps and many conversations over the
8 course of multiple days. It also meant that I was opening up private files so that they could be
9 searched. I allowed this to be done because I believed in the case and it was important to the success
10 of the case. I estimate that I spent 15 hours on this process.

11 11. Because the case lasted so long, I had to search for documents again at a later date to
12 see whether any new documents could be found. I discussed this with my attorneys over multiple
13 lengthy phone calls and spent significant time on this supplemental search process.

14 12. In total, I estimate that I spent around 30 hours performing tasks related to searching
15 for documents.

16 13. I was also served with three sets of interrogatories. I had phone calls with my
17 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
18 interrogatory answers to ensure their accuracy. I estimate that I spent around six hours related to
19 responding to interrogatories.

20 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
21 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
22 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
23 consumed around five hours.

24 15. My deposition (including breaks) lasted around eight hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around two hours.

26 16. I estimate that the total time spent related to my deposition was around 20 hours.
27
28

Prior Declaration

17. I previously provided a declaration in support of Class Certification and Motion to Intervene. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

18. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 15 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

19. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declaration, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around five hours on this process.

20. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around 10 hours on this process.

Reputational Risks

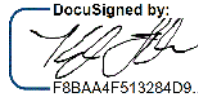
21. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

1 22. I willingly took on these risks and burdens because I felt strongly that the working
2 conditions for minor league players needed to be improved, including how players are paid. I took on
3 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
4 risks because it was the right thing to do. I am proud that I played an important role in this landmark
5 case, and am proud of the result achieved for thousands of fellow players.

6 23. In light of the above, I respectfully request an incentive award in recognition of the
7 service that I provided in the case. I believe it is warranted here because of the extensive time that I
8 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
9 way through to settlement.

10 I declare under penalty of perjury that the foregoing is true and correct.

11
12 Executed on 10/19/2022

13 DocuSigned by:
14 
15 F8BAA4F513284D9...

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15 Plaintiffs' Co-Lead Class Counsel

17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

18 AARON SENNE, et al., Individually and on
19 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
23 BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
24 BASEBALL, et al.,

25 Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF KYLE NICHOLSON IN
SUPPORT OF MOTION FOR INCENTIVE
AWARDS**

1 I, Kyle Nicholson, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 15 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent four hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 20 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around five hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around six and a half hours.

23 15. I then traveled to my deposition. That took around one hour each way.

24 16. My deposition (including breaks) lasted around eight hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around two hours.

26 17. I estimate that the total time spent related to my deposition was around 20 hours.
27
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one and a half hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one and a half hours related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 10 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around 10 hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around one hour on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball

1 community would likely know that I was part of the case. I also knew that it would be possible for
2 employers, both within and outside of the sports industry, to find out that I had brought this
3 employment-related case.

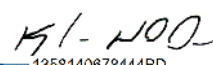
4 24. I willingly took on these risks and burdens because I felt strongly that the working
5 conditions for minor league players needed to be improved, including how players are paid. I took on
6 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
7 risks because it was the right thing to do. I am proud that I played an important role in this landmark
8 case, and am proud of the result achieved for thousands of fellow players.

9 25. In light of the above, I respectfully request an incentive award in recognition of the
10 service that I provided in the case. I believe it is warranted here because of the extensive time that I
11 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
12 way through to settlement.

13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed on 10/17/2022 _____

16 DocuSigned by:

17 
18 1358140878444BD... _____

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14
 15 Plaintiffs' Co-Lead Class Counsel

16
 17 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

18 AARON SENNE, et al., Individually and on
 19 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
 25
 26
 27
 28

CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF KYLE WOODRUFF IN
 SUPPORT OF MOTION FOR INCENTIVE
 AWARDS**

1 I, Kyle Woodruff, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about three hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent two and a half hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent four and a half hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around ten hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around five hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I took an hour and a half train ride each way to one of my
22 deposition preps. I estimate that the time spent preparing for the deposition consumed around eight
23 and a half hours.

24 15. I then traveled to my deposition, which included taking flights and trains. That took
25 around five and a half hours each way.

26 16. My deposition (including breaks) lasted around nine hours. After the deposition, I
27 reviewed the transcript to ensure it was accurate. I estimate that this took around four hours.

28 17. I estimate that the total time spent related to my deposition was around 35 hours.

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a half-hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a half-hours related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 22 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around two-and-a-half hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around an hour on this process.

Reputational Risks

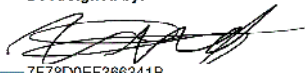
24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022

DocuSigned by:

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15 Plaintiffs' Co-Lead Class Counsel
16

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.
25
26
27
28

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF LAUREN GAGNIER IN
SUPPORT OF MOTION FOR INCENTIVE
AWARDS**

1 I, Lauren Gagnier, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over seven years. I decided to join this case because
8 I felt strongly that minor league players were not being properly paid. I understood from the outset
9 that being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on May 20, 2015. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about 10 hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 15 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent 10 hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 30 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around five hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had a prep session for the deposition. I reviewed documents
21 to prepare for the deposition. I estimate that the time spent preparing for the deposition consumed
22 around seven hours.

23 15. I then traveled to my deposition. That took around one-and-a-half hours each way.

24 16. My deposition (including breaks) lasted around nine and a half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around one
26 hour.

27 17. I estimate that the total time spent related to my deposition was around 25 hours.
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 20 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around five hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022

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2758D90B2CD8498...

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Plaintiffs' Co-Lead Class Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF LEONARD DAVIS IN
SUPPORT OF MOTION FOR INCENTIVE
AWARDS**

1 I, Leonard Davis, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over seven years. I decided to join this case because
8 I felt strongly that minor league players were not being properly paid. I understood from the outset
9 that being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on May 20, 2015. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about eight hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent five hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent three hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 10 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around two hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around two hours.

23 15. I then traveled to my deposition. That took around three hours each way.

24 16. My deposition (including breaks) lasted around eight and a half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around one
26 and a half hours.

27 17. I estimate that the total time spent related to my deposition was around 20 hours.
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around three hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around three hours related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 15 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around two hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around three hours on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball

1 community would likely know that I was part of the case. I also knew that it would be possible for
2 employers, both within and outside of the sports industry, to find out that I had brought this
3 employment-related case.

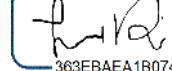
4 24. I willingly took on these risks and burdens because I felt strongly that the working
5 conditions for minor league players needed to be improved, including how players are paid. I took on
6 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
7 risks because it was the right thing to do. I am proud that I played an important role in this landmark
8 case, and am proud of the result achieved for thousands of fellow players.

9 25. In light of the above, I respectfully request an incentive award in recognition of the
10 service that I provided in the case. I believe it is warranted here because of the extensive time that I
11 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
12 way through to settlement.

13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed on 10/21/2022 _____

16 DocuSigned by:

17 

18 363EBAEA1B07420... _____

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Plaintiffs' Co-Lead Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF LES SMITH IN SUPPORT OF
MOTION FOR INCENTIVE AWARDS**

1 I, Les Smith, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over 8 years. I decided to join this case because I felt
8 strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on April 21, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about six hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent five hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent seven hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 15 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around 8 hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around 10 hours.

23 15. I then traveled to my deposition. That took around 45 minutes each way.

24 16. My deposition (including breaks) lasted around seven hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around six hours.

26 17. I estimate that the total time spent related to my deposition was around 25 hours.
27
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 25 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around three hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around one hour on this process.

Reputational Risks

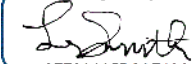
24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022

DocuSigned by:

9FF9A1A5BCAF4AA...

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15 Plaintiffs' Co-Lead Class Counsel

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

18 AARON SENNE, et al., Individually and on
19 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF MARK WAGNER IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Mark Wagner, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over seven years. I decided to join this case because
8 I felt strongly that minor league players were not being properly paid. I understood from the outset
9 that being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on May 20, 2015. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about 10 hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 20 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent 10 hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 40 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around 12 hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around five hours.

23 15. I then traveled to my deposition. That took around one and a half hours each way.

24 16. My deposition (including breaks) lasted around eight and a half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around two
26 hours.

27 17. I estimate that the total time spent related to my deposition was around 23 hours.
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 20 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around six hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around three hours on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball

1 community would likely know that I was part of the case. I also knew that it would be possible for
2 employers, both within and outside of the sports industry, to find out that I had brought this
3 employment-related case.

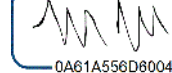
4 24. I willingly took on these risks and burdens because I felt strongly that the working
5 conditions for minor league players needed to be improved, including how players are paid. I took on
6 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
7 risks because it was the right thing to do. I am proud that I played an important role in this landmark
8 case, and am proud of the result achieved for thousands of fellow players.

9 25. In light of the above, I respectfully request an incentive award in recognition of the
10 service that I provided in the case. I believe it is warranted here because of the extensive time that I
11 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
12 way through to settlement.

13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed on 10/17/2022

16 DocuSigned by:

17 

18 0A61A556D800454...

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 15 Plaintiffs' Co-Lead Class Counsel
 16

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
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20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
 25
 26
 27
 28

CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF MATT DALY IN SUPPORT OF
 MOTION FOR INCENTIVE AWARDS**

1 I, Matt Daly, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about four to five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent two to three hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent three to four hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 10 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six to nine hours related
18 to responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had a prep session for the deposition. I reviewed documents
21 to prepare for the deposition. I estimate that the time spent preparing for the deposition consumed
22 around three and a half to four hours.

23 15. I then traveled to my deposition. That took around one hour each way.

24 16. My deposition (including breaks) lasted around five and a half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around four to
26 five hours.

27 17. I estimate that the total time spent related to my deposition was around 17 hours.

28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 25 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around eight hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around three to four hours on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for

1 employers, both within and outside of the sports industry, to find out that I had brought this
2 employment-related case.

3 24. I willingly took on these risks and burdens because I felt strongly that the working
4 conditions for minor league players needed to be improved, including how players are paid. I took on
5 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
6 risks because it was the right thing to do. I am proud that I played an important role in this landmark
7 case, and am proud of the result achieved for thousands of fellow players.

8 25. In light of the above, I respectfully request an incentive award in recognition of the
9 service that I provided in the case. I believe it is warranted here because of the extensive time that I
10 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
11 way through to settlement.

12 I declare under penalty of perjury that the foregoing is true and correct.

13
14 Executed on 10/17/2022 _____

15 DocuSigned by:
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Plaintiffs' Co-Lead Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

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doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF MATT FREVERT IN
SUPPORT OF MOTION FOR INCENTIVE
AWARDS**

1 I, Matt Frevert, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on April 21, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about three hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 15 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
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5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent two hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 20 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around three hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around seven hours.

23 15. I then traveled to my deposition. That took around two hours each way.

24 16. My deposition (including breaks) lasted around eight hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around three hours.

26 17. I estimate that the total time spent related to my deposition was around 25 hours.
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Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 20 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around three hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around an hour on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for

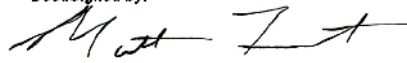
1 employers, both within and outside of the sports industry, to find out that I had brought this
2 employment-related case.

3 24. I willingly took on these risks and burdens because I felt strongly that the working
4 conditions for minor league players needed to be improved, including how players are paid. I took on
5 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
6 risks because it was the right thing to do. I am proud that I played an important role in this landmark
7 case, and am proud of the result achieved for thousands of fellow players.

8 25. In light of the above, I respectfully request an incentive award in recognition of the
9 service that I provided in the case. I believe it is warranted here because of the extensive time that I
10 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
11 way through to settlement.

12 I declare under penalty of perjury that the foregoing is true and correct.

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14 Executed on 10/19/2022 _____

15 DocuSigned by:
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Plaintiffs' Co-Lead Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF MATT LAWSON IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Matt Lawson, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about two hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.
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1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent five hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent three and a half hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 10 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around seven hours.

23 15. I then traveled to my deposition. That took around three hours each way.

24 16. My deposition (including breaks) lasted around seven hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around one hour.

26 17. I estimate that the total time spent related to my deposition was around 23 hours.
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Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one and a half hours related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 20 hours on generally staying informed about what was going on in the case and discussing what would come next.

22. I participated in an interview with a reporter regarding this case. I had discussions with my attorneys in preparation for this interview. I estimate that I spent around three hours on this process, which I believe assisted in helping other minor league players learn about the case.

Trial Preparations and Settlement

23. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around one hour on this process.

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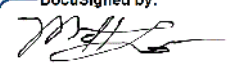
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1 I declare under penalty of perjury that the foregoing is true and correct.

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3 Executed on 10/20/2022

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 3 MARC A. WALLENSTEIN (*pro hac vice*)
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 4 DIANE MOORE (Bar No. 214903)
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 BOBBY POUYA (Bar No. 245527)
 11 bpouya@pswlaw.com
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 Facsimile: (415) 433-9008

15 Plaintiffs' Co-Lead Class Counsel
 16

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
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CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF MICHAEL LIBERTO IN
 SUPPORT OF MOTION FOR INCENTIVE
 AWARDS**

1 I, Michael Liberto, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on February 7, 2014. Before doing so, I had multiple calls with
15 my attorneys in this case and traded multiple emails. I provided information about my career, my
16 work routines, and my pay, which helped my attorneys draft my complaint and gain a better
17 understanding of the case. I also began the process of looking for employment-related documents and
18 providing them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about eight hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 25 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent three hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 30 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around three hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around four hours.

23 15. I then traveled to my deposition. That took around one hour each way.

24 16. My deposition (including breaks) lasted around nine hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around five hours.

26 17. I estimate that the total time spent related to my deposition was around 25 hours.

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Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 40 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around two hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around an hour on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for

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15 Plaintiffs' Co-Lead Class Counsel
16

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.
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CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF MITCH HILLIGOSS IN
SUPPORT OF MOTION FOR INCENTIVE
AWARDS**

1 I, Mitch Hilligoss, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on April 21, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent two hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent three hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around ten hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around three hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around five hours.

23 15. I then traveled to my deposition. That took around four hours each way.

24 16. My deposition (including breaks) lasted around seven hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around one hour.

26 17. I estimate that the total time spent related to my deposition was around 25 hours.
27
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Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 25 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around three hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

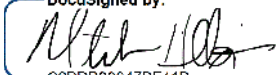
24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/18/2022

DocuSigned by:

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15 Plaintiffs' Co-Lead Class Counsel
 16

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
 25
 26
 27
 28

CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF NICK GIARRAPUTO IN
 SUPPORT OF MOTION FOR INCENTIVE
 AWARDS**

1 I, Nick Giarraputo, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Pre-filing Work Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over seven years. I decided to join this case because
8 I felt strongly that minor league players were not being properly paid. I understood from the outset
9 that being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on May 20, 2015. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent one hour looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent two and a half hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around five hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around 15 hours.

23 15. I then traveled to my deposition. That took around one and a half hours each way.

24 16. My deposition (including breaks) lasted around eight and a half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around three
26 hours.

27 17. I estimate that the total time spent related to my deposition was around 30 hours.

28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one and a half hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one and a half hours related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one and a half hours related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 20 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around five hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

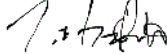
24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/21/2022

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Plaintiffs' Co-Lead Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF OLIVER ODLE IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Oliver Odle, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on February 7, 2014. Before doing so, I had multiple calls with
15 my attorneys in this case and traded multiple emails. I provided information about my career, my
16 work routines, and my pay, which helped my attorneys draft my complaint and gain a better
17 understanding of the case. I also began the process of looking for employment-related documents and
18 providing them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 10 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent five hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 20 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around four and a half hours.

23 15. I then traveled to my deposition. That took around five hours each way.

24 16. My deposition (including breaks) lasted around eight hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around two hours.

26 17. I estimate that the total time spent related to my deposition was around 30 hours.
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Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 40 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around 15 hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around an hour on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for


1 employers, both within and outside of the sports industry, to find out that I had brought this
2 employment-related case.

3 24. I willingly took on these risks and burdens because I felt strongly that the working
4 conditions for minor league players needed to be improved, including how players are paid. I took on
5 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
6 risks because it was the right thing to do. I am proud that I played an important role in this landmark
7 case, and am proud of the result achieved for thousands of fellow players.

8 25. In light of the above, I respectfully request an incentive award in recognition of the
9 service that I provided in the case. I believe it is warranted here because of the extensive time that I
10 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
11 way through to settlement.

12 I declare under penalty of perjury that the foregoing is true and correct.

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14 Executed on 10/17/2022 _____

15 DocuSigned by:
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15 Plaintiffs' Co-Lead Class Counsel
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17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
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20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
 25
 26
 27
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CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF OMAR AGUILAR IN SUPPORT
 OF MOTION FOR INCENTIVE AWARDS**

1 I, Omar Aguilar, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over seven years. I decided to join this case because
8 I felt strongly that minor league players were not being properly paid. I understood from the outset
9 that being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on May 20, 2015. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent one hour looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent five hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around ten hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around ten hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around six hours.

23 15. I then traveled to my deposition. That took around two hours each way.

24 16. My deposition (including breaks) lasted around eight hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around five hours.

26 17. I estimate that the total time spent related to my deposition was around 25 hours.
27
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Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two hours related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 25 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around five hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball

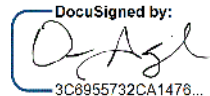
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2 employers, both within and outside of the sports industry, to find out that I had brought this
3 employment-related case.

4 24. I willingly took on these risks and burdens because I felt strongly that the working
5 conditions for minor league players needed to be improved, including how players are paid. I took on
6 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
7 risks because it was the right thing to do. I am proud that I played an important role in this landmark
8 case, and am proud of the result achieved for thousands of fellow players.

9 25. In light of the above, I respectfully request an incentive award in recognition of the
10 service that I provided in the case. I believe it is warranted here because of the extensive time that I
11 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
12 way through to settlement.

13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed on 10/17/2022

16 DocuSigned by:
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15 Plaintiffs' Co-Lead Class Counsel

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

18 AARON SENNE, et al., Individually and on
19 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF ROBERTO ORTIZ IN
SUPPORT OF MOTION FOR INCENTIVE
AWARDS**

1 I, Roberto Ortiz, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on April 21, 2014. Before doing so, I had multiple calls with my
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18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about 15 hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
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5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 20 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around five hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had a prep session for the deposition. I reviewed documents
21 to prepare for the deposition. I estimate that the time spent preparing for the deposition consumed
22 around two hours.

23 15. I then traveled to my deposition. That took around 45 minutes each way.

24 16. My deposition (including breaks) lasted around eight hours. After the deposition, I
25 reviewed the transcript to ensure it was accurate. I estimate that this took around four hours.

26 17. I estimate that the total time spent related to my deposition was around 16 hours.
27
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two and a half hours related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two and a half hours related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 30 hours on generally staying informed about what was going on in the case and discussing what would come next.

21. I also participated in an interview with a Telemundo reporter regarding this case. I had discussions with my attorneys in preparation for this interview. I estimate that I spent around eight hours on this process.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had prep sessions with my attorneys to prepare to testify at trial.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around 25 hours on the trial preparation and settlement process.

Reputational Risks

24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____

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15 Abogado colíder del grupo de demandantes

16

17
18 **TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS**
19 **DISTRITO NORTE DE CALIFORNIA, DIVISIÓN DE SAN FRANCISCO**

20 AARON SENNE, y otros, individualmente y
en nombre de todos los que están en
situación similar,

21 Demandantes,

22 vs.

23 OFICINA DEL COMISIONADO DE
24 BÉISBOL, una asociación no incorporada
que hace negocios como GRANDES LIGAS
25 DE BÉISBOL, y otros, y que se encuentra en
el proceso de selección,

26 Demandados.

27

28

CASO NÚMERO 3:14-cv-00608-JCS
(consolidado con 3:14-cv-03289-JCS)

DEMANDA JUDICIAL COLECTIVA

**DECLARACIÓN DE ROBERTO ORTIZ EN APOYO
DE LA MOCIÓN PARA LA CONCESIÓN DE
INCENTIVOS**

1 Yo, Roberto Ortiz, declaro lo siguiente:

2 1. Soy uno de los demandantes nombrados en este caso. Presento esta Declaración en
3 apoyo de la Moción de los Demandantes para la concesión de incentivos.

4 2. Conozco personalmente los hechos expuestos en esta Declaración. En caso de ser
5 llamado como testigo, podría testificar, y lo haría de forma competente, sobre los asuntos aquí
6 expuestos.

7 **Decisión y esfuerzo para sumarse a la demanda**

8 3. He sido parte de este caso durante más de ocho años. Decidí sumarme a este caso
9 porque me parecía que los jugadores de las ligas menores no recibían una remuneración adecuada.
10 Comprendí desde el principio que ser un demandante nombrado no me proporcionaría un gran
11 beneficio financiero y que no había garantía de éxito.

12 4. A pesar de ello, me incorporé al caso y le dediqué mucho tiempo. Era un tiempo que
13 podía haber dedicado a otros menesteres, con mi familia y amigos o con el trabajo. En cambio, lo
14 dediqué a garantizar el mejor resultado posible para todos mis colegas de las ligas menores.

15 5. Presenté mi denuncia el 21 de abril de 2014. Antes de hacerlo, tuve múltiples llamadas
16 con mis abogados en este caso e intercambié múltiples correos electrónicos. Proporcioné información
17 sobre mi carrera, mis rutinas de trabajo y mi salario, lo que ayudó a mis abogados a redactar mi
18 demanda y a comprender mejor el caso. También comencé el proceso de búsqueda de documentos
19 relacionados con el empleo y los proporcioné a mis abogados.

20 6. Revisé el proyecto de denuncia antes de presentarlo para asegurarme de que los
21 hechos eran correctos. Me comuniqué con mis abogados sobre el proyecto de denuncia y sobre cuáles
22 serían los siguientes pasos.

23 7. Calculo que este proceso previo a la presentación consumió unas 15 horas de mi
24 tiempo.

25 **Descubrimiento**

26 8. Fui objeto de un amplio proceso de investigación en el caso. Se me entregaron dos
27 series de solicitudes de producción. Tuve numerosas llamadas telefónicas e intercambié numerosos
28

1 correos electrónicos con mis abogados para discutir las solicitudes de presentación y mi obligación de
2 buscar y presentar documentos relacionados con mi carrera.

3 9. Me tomé muy en serio esta responsabilidad. Busqué documentos en papel en muchos
4 lugares durante varios días.

5 10. También asistí a mis abogados en la búsqueda de documentos electrónicos. Me reuní
6 con miembros del equipo de mis abogados o con un proveedor contratado por ellos para que me
7 ayudara a recopilar los documentos electrónicos. A menudo era una tarea tediosa que implicaba varios
8 pasos y muchas conversaciones a lo largo de varios días. También significaba que estaba abriendo
9 archivos privados para que pudieran ser buscados. Lo permití porque creía en el caso y era importante
10 para el éxito del mismo.

11 11. Como el caso duró tanto tiempo, tuve que volver a buscar los documentos en una
12 fecha posterior para ver si se podía encontrar algún documento nuevo. Lo discutí con mis abogados
13 en múltiples y largas llamadas telefónicas y dediqué mucho tiempo a este proceso de búsqueda
14 complementaria.

15 12. En total, estimo que pasé unas 20 horas realizando tareas relacionadas con la búsqueda
16 de documentos.

17 13. También se me entregaron tres juegos de interrogatorios. Tuve llamadas telefónicas
18 con mis abogados para discutir estos interrogatorios y las respuestas, y también intercambié correos
19 electrónicos. He revisado las respuestas al interrogatorio para asegurarme de su exactitud. Las
20 respuestas a mis interrogatorios fueron modificadas varias veces, y las revisé cada vez. Calculo que
21 pasé unas cinco horas relacionadas con la respuesta a los interrogatorios.

22 14. Me senté para una declaración en este caso. Tuve múltiples llamadas con mis abogados
23 e intercambié mensajes para discutir la declaración. También tuve una sesión de preparación para la
24 declaración. Revisé los documentos para preparar la declaración. Calculo que el tiempo dedicado a la
25 preparación de la declaración consumió unas dos horas.

26 15. Luego viajé a mi declaración. Eso llevó unos 45 minutos en cada sentido.
27
28

17. Calculo que el tiempo total dedicado a mi declaración fue de unas 16 horas.

18. Anteriormente proporcioné una declaración en apoyo de la Moción de los Demandantes para la Notificación a la Clase y la Certificación Condicional de conformidad con la Ley de Normas Laborales Justas. Proporcioné información a mis abogados para que pudieran redactar esta declaración. Antes de firmarlo, lo revisé para asegurarme de su exactitud. Calculo que pasé unas dos horas y media relacionadas con esa declaración.

19. También proporcioné una declaración en apoyo de la Moción de los Demandantes para la Certificación de la Clase. Proporcioné información a mis abogados para que pudieran redactar esta declaración. Antes de firmarlo, lo revisé para asegurarme de su exactitud. Calculo que pasé unas dos horas y media relacionadas con esa declaración.

20. A lo largo de mis años de participación en el caso, me he mantenido informado del progreso a través de discusiones y comunicaciones escritas con mi abogado y la revisión de los archivos del tribunal. He recibido llamadas periódicas y he intercambiado mensajes regulares sobre el caso en todo momento. Esto ha incluido discusiones sobre importantes presentaciones y la revisión de las principales órdenes del caso. Calculo que he dedicado 30 horas a mantenerme informado en general de lo que ocurría en el caso y a discutir lo que vendría después.

21. También participé en una entrevista con un reportero de Telemundo sobre este caso. He hablado con mis abogados para preparar esta entrevista. Calculo que he invertido unas ocho horas en este proceso.

22. A medida que se acercaba la fecha del juicio, empecé a recibir llamadas y a intercambiar mensajes para hablar de mi posible testimonio en el juicio. Empecé a revisar los documentos para prepararme, incluyendo la transcripción de mi declaración, las declaraciones y las

1 respuestas a los interrogatorios. Tuve sesiones de preparación con mis abogados para prepararme a
2 testificar en el juicio.

3 23. Mis abogados también se comunicaron conmigo sobre la mediación y las posibilidades
4 de acuerdo. Recibí el acuerdo de conciliación y lo revisé antes de firmarlo. Calculo que dediqué unas
5 25 horas a la preparación del juicio y al proceso de conciliación.

6 **Riesgos para la reputación**


7 24. Como demandante nombrado en este novedoso y destacado pleito contra un
8 empleador muy conocido y popular, corría un riesgo significativo de dañar mi reputación y mis
9 perspectivas de empleo en el futuro. Sabía que mi nombre sería público, y sabía que los miembros de
10 la comunidad del béisbol probablemente sabrían que yo formaba parte del caso. También sabía que
11 era posible que los empleadores, tanto dentro como fuera de la industria del deporte, se enteraran de
12 que había presentado este caso relacionado con el empleo.

13 25. Asumí de buen grado estos riesgos y cargas porque estaba convencido de que había
14 que mejorar las condiciones de trabajo de los jugadores de las ligas menores, incluida la forma de
15 pagar a los jugadores. Asumí la carga de abrirme a un descubrimiento intrusivo y prolongado y a la
16 posibilidad de riesgos para la reputación porque era lo correcto. Estoy orgulloso de haber
17 desempeñado un papel importante en este caso histórico, y estoy orgulloso del resultado obtenido
18 para miles de compañeros.

19 26. En vista de lo anterior, solicito respetuosamente un premio de incentivo en
20 reconocimiento del servicio que presté en el caso. Creo que se justifica en este caso por el tiempo que
21 he dedicado a este largo, muy publicitado y polémico caso, y por mi compromiso de llevarlo hasta el
22 final.

23 Declaro bajo pena de perjurio que lo anterior es cierto y correcto.

24
25 Ejecutado en 10/22/2022

26 DocuSigned by:
27 
28 CE9DF69F9C994FB...



Certified Translation

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 Salt Lake City, UT 84101
 Phone: +1 (801) 618-3450
 Email: info@inwhatlanguage.com
 Web: www.inwhatlanguage.com

inWhatLanguage, a professional translation firm, hereby declares that in our professional opinion and to the best of our knowledge and belief, the attached Declaration documents was translated from English to Spanish by a native-speaking inWhatLanguage linguist and is a faithful and accurate translation.

The translation work was provided by resources vetted and qualified as United States citizens performing the work within the United States of America.

The translator besides meeting the residency and citizenship criteria has also been established, through testing, to be a competent professional translator and the work has been subject to a review and edit by an independent and similarly qualified editor fluent in both languages

Name: Amanda Jean Best

Signature:

Title: Office Manager

Date: 10/20/2022

State of Utah, County of Salt Lake On this 20th day of October, in the year 2022, before me, Jacqueline Rodriguez Pinon, a notary public, personally appeared, Amanda Jean Best, proved on the basis of satisfactory evidence to be the person(s) whose name is subscribed to this instrument, and acknowledged he/she executed the same.

Witness my hand and official seal.

Notary Name Jacqueline Rodriguez Pinon Signature



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15 Plaintiffs' Co-Lead Class Counsel

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

18 AARON SENNE, et al., Individually and on
19 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF RYAN HUTSON IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Ryan Hutson, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on April 21, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.
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1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent five hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent three hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 10 hours performing tasks related to searching
13 for documents.

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16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around three hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around five hours.

23 15. I then traveled to my deposition. That took around three hours each way.

24 16. My deposition (including breaks) lasted around eight and a half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around three
26 hours.

27 17. I estimate that the total time spent related to my deposition was around 22 and a half
28 hours.

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 15 hours on generally staying informed about what was going on in the case and discussing what would come next.

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22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around one hour on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for

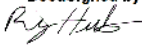
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3 24. I willingly took on these risks and burdens because I felt strongly that the working
4 conditions for minor league players needed to be improved, including how players are paid. I took on
5 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
6 risks because it was the right thing to do. I am proud that I played an important role in this landmark
7 case, and am proud of the result achieved for thousands of fellow players.

8 25. In light of the above, I respectfully request an incentive award in recognition of the
9 service that I provided in the case. I believe it is warranted here because of the extensive time that I
10 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
11 way through to settlement.

12 I declare under penalty of perjury that the foregoing is true and correct.

13
14 Executed on 10/19/2022 _____

15 DocuSigned by:
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17 005405345F2B46E... _____
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Plaintiffs' Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF RYAN KHOURY IN SUPPORT
OF MOTION FOR INCENTIVE AWARDS**

1 I, Ryan Khoury, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about 12 hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.
28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent 25 hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent seven hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 35 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around eight hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around five hours.

23 15. I then traveled to my deposition. That took around six hours each way.

24 16. My deposition (including breaks) lasted around eight and a half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around two
26 hours.

27 17. I estimate that the total time spent related to my deposition was around 25 hours.
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two-and-a-half hours related to that declaration.

19. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around two-and-a-half hours related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one-and-a-half hours related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 40 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

22. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around four hours on this process.

23. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

24. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

25. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

26. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/19/2022

DocuSigned by:

Ryan Khoury

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Plaintiffs' Co-Lead Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

AARON SENNE, et al., Individually and on
Behalf of All Those Similarly Situated,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, et al.,

Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF RYAN KIEL IN SUPPORT OF
MOTION FOR INCENTIVE AWARDS**

1 I, Ryan Kiel, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.
28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent five hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent five hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around 15 hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around four hours.

23 15. I then traveled to my deposition. That took around two-and-a-half hours each way.

24 16. My deposition (including breaks) lasted around eight-and-a-half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around three
26 hours.

27 17. I estimate that the total time spent related to my deposition was around 25 hours.
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

20. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent five hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

21. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had multiple prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around 15 hours on this process.

22. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

23. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for

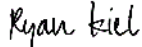
1 employers, both within and outside of the sports industry, to find out that I had brought this
2 employment-related case.

3 24. I willingly took on these risks and burdens because I felt strongly that the working
4 conditions for minor league players needed to be improved, including how players are paid. I took on
5 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
6 risks because it was the right thing to do. I am proud that I played an important role in this landmark
7 case, and am proud of the result achieved for thousands of fellow players.

8 25. In light of the above, I respectfully request an incentive award in recognition of the
9 service that I provided in the case. I believe it is warranted here because of the extensive time that I
10 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
11 way through to settlement.

12 I declare under penalty of perjury that the foregoing is true and correct.

13
14 Executed on 10/17/2022 _____

15 DocuSigned by:
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17 56F7BFAFA1DB43E... _____
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15 Plaintiffs' Co-Lead Class Counsel
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17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
 Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
 BASEBALL, an unincorporated association
 23 doing business as MAJOR LEAGUE
 BASEBALL, et al.,

24 Defendants.
 25
 26
 27
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CASE NO. 3:14-cv-00608-JCS (consolidated with
 3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF TIM PAHUTA IN SUPPORT
 OF MOTION FOR INCENTIVE AWARDS**

1 I, Tim Pahuta, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on March 5, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days. I estimate that I spent two hours looking for documents.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case. I estimate that I spent five hours on this process.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around nine hours performing tasks related to
13 searching for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around six hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around five hours.

23 15. I then traveled to my deposition. That took around five and a half hours each way.

24 16. My deposition (including breaks) lasted around seven and a half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around three
26 hours.

27 17. I estimate that the total time spent related to my deposition was around 27 hours.
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' memorandum regarding personal jurisdiction and venue. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

19. I also provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

20. I also provided a declaration in support of Plaintiffs' Motion for Class Certification. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one hour related to that declaration.

General Work to Stay Informed

21. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 25 hours on generally staying informed about what was going on in the case and discussing what would come next.

22. I also participated in an interview with an HBO reporter regarding this case. I had discussions with my attorneys in preparation for this interview. I estimate that I spent around 10 hours on this process, and I believe it helped to inform other minor league players about the case and the legal rights being asserted.

Trial Preparations and Settlement

23. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep sessions with my attorneys to prepare to testify at trial. I estimate that I spent around four hours on this process.

24. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around two hours on this process.

Reputational Risks

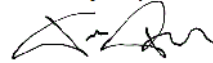
25. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

26. I willingly took on these risks and burdens because I felt strongly that the working conditions for minor league players needed to be improved, including how players are paid. I took on the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational risks because it was the right thing to do. I am proud that I played an important role in this landmark case, and am proud of the result achieved for thousands of fellow players.

27. In light of the above, I respectfully request an incentive award in recognition of the service that I provided in the case. I believe it is warranted here because of the extensive time that I put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the way through to settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/17/2022

DocuSigned by:

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15 Plaintiffs' Co-Lead Class Counsel
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17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on
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20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
23 doing business as MAJOR LEAGUE
BASEBALL, et al.,

24 Defendants.
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CASE NO. 3:14-cv-00608-JCS (consolidated with
3:14-cv-03289-JCS)

CLASS ACTION

**DECLARATION OF WITER JIMENEZ IN
SUPPORT OF MOTION FOR INCENTIVE
AWARDS**

1 I, Witer Jimenez, hereby declare as follows:

2 1. I am one of the named plaintiffs in this case. I submit this Declaration in support of
3 Plaintiffs' Motion for Incentive Awards.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a
5 witness, I could and would competently testify to the matters stated herein.

6 **Decision and Effort to Join the Lawsuit**

7 3. I have been a part of this case for over eight years. I decided to join this case because I
8 felt strongly that minor league players were not being properly paid. I understood from the outset that
9 being a named plaintiff would not provide a large financial benefit to me and that there was no
10 guarantee of success.

11 4. Despite that knowledge, I still joined and devoted significant time to the case. That
12 was time that I could have dedicated to other endeavors, with my family and friends or with work. I
13 instead devoted it to ensuring the best possible outcome for all of my colleagues in the minor leagues.

14 5. I filed my complaint on April 21, 2014. Before doing so, I had multiple calls with my
15 attorneys in this case and traded multiple emails. I provided information about my career, my work
16 routines, and my pay, which helped my attorneys draft my complaint and gain a better understanding
17 of the case. I also began the process of looking for employment-related documents and providing
18 them to my attorneys.

19 6. I reviewed the draft complaint before it was filed to make sure that the facts were
20 correct. I communicated with my attorneys about the draft complaint and about what the next steps
21 would be.

22 7. I estimate that this pre-filing process consumed about five hours of my time.

23 **Discovery**

24 8. I was the subject of extensive discovery in the case. I was served with two sets of
25 requests for production. I had numerous phone calls and traded numerous emails with my attorneys
26 to discuss the requests for production and my obligation to search for and produce documents related
27 to my career.
28

1 9. I took this responsibility seriously. I looked for paper documents in multiple places
2 over multiple days.

3 10. I also assisted my attorneys with looking for electronic documents. I met with
4 members of my attorneys' team or a vendor hired by them to assist in the collection of electronic
5 documents. This was often a tedious task that entailed several steps and many conversations over the
6 course of multiple days. It also meant that I was opening up private files so that they could be
7 searched. I allowed this to be done because I believed in the case and it was important to the success
8 of the case.

9 11. Because the case lasted so long, I had to search for documents again at a later date to
10 see whether any new documents could be found. I discussed this with my attorneys over multiple
11 lengthy phone calls and spent significant time on this supplemental search process.

12 12. In total, I estimate that I spent around five hours performing tasks related to searching
13 for documents.

14 13. I was also served with three sets of interrogatories. I had phone calls with my
15 attorneys to discuss these interrogatories and the answers, and I also exchanged emails. I reviewed the
16 interrogatory answers to ensure their accuracy. The answers to my interrogatories were amended
17 multiple times, and I reviewed them each time. I estimate that I spent around three hours related to
18 responding to interrogatories.

19 14. I sat for a deposition in this case. I had multiple calls with my attorneys and exchanged
20 messages to discuss the deposition. I also had multiple prep sessions for the deposition. I reviewed
21 documents to prepare for the deposition. I estimate that the time spent preparing for the deposition
22 consumed around four hours.

23 15. I then traveled to my deposition. That took around 30 minutes each way.

24 16. My deposition (including breaks) lasted around nine and a half hours. After the
25 deposition, I reviewed the transcript to ensure it was accurate. I estimate that this took around one
26 hour.

27 17. I estimate that the total time spent related to my deposition was around 16 hours.
28

Prior Declarations

18. I previously provided a declaration in support of Plaintiffs' Motion for Notice to the Class and Conditional Certification Pursuant to the Fair Labor Standards Act. I provided information to my attorneys so that they could draft this declaration. Before signing it, I reviewed it to ensure its accuracy. I estimate that I spent around one and a half hours related to that declaration.

General Work to Stay Informed

19. Throughout my years of being involved in the case, I have stayed informed of the progress through discussions and written communications with my counsel and review of court filings. I have had regular calls and have exchanged regular messages about the case throughout. That has included discussions about important filings and review of the major orders in the case. I estimate that I have spent 40 hours on generally staying informed about what was going on in the case and discussing what would come next.

Trial Preparations and Settlement

20. As the trial date grew closer, I began having calls and exchanging messages to discuss my possible trial testimony. I began reviewing documents to prepare for it, including my deposition transcript, declarations, and interrogatory answers. I had a prep session with my attorneys to prepare to testify at trial. I estimate that I spent around two hours on this process.

21. My attorneys also communicated with me about mediation and settlement possibilities. I received the settlement agreement and reviewed it before signing it. I estimate that I spent around one hour on this process.

Reputational Risks

22. As a named plaintiff in this novel, high-profile lawsuit against a well-known and popular employer, I bore significant risk of harm to my reputation and my prospects for future employment. I knew that my name would be public, and I knew that members of the baseball community would likely know that I was part of the case. I also knew that it would be possible for employers, both within and outside of the sports industry, to find out that I had brought this employment-related case.

1 23. I willingly took on these risks and burdens because I felt strongly that the working
2 conditions for minor league players needed to be improved, including how players are paid. I took on
3 the burden of opening myself up to intrusive and lengthy discovery and the possibility of reputational
4 risks because it was the right thing to do. I am proud that I played an important role in this landmark
5 case, and am proud of the result achieved for thousands of fellow players.

6 24. In light of the above, I respectfully request an incentive award in recognition of the
7 service that I provided in the case. I believe it is warranted here because of the extensive time that I
8 put into this lengthy, well-publicized, and contentious case, and my commitment to seeing it all the
9 way through to settlement.

10 I declare under penalty of perjury that the foregoing is true and correct.

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12 Executed on _____

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16 Abogado colíder del grupo de demandantes
17

18 **TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS**
19 **DISTRITO NORTE DE CALIFORNIA, DIVISIÓN DE SAN FRANCISCO**

20 AARON SENNE, y otros, individualmente y
en nombre de todos los que están en
21 situación similar,

22 Demandantes,

23 vs.

24 OFICINA DEL COMISIONADO DE
BÉISBOL, una asociación no incorporada
25 que hace negocios como GRANDES LIGAS
DE BÉISBOL, y otros, y que se encuentra en
26 el proceso de selección,

27 Demandados.
28

CASO NÚMERO 3:14-cv-00608-JCS
(consolidado con 3:14-cv-03289-JCS)

DEMANDA JUDICIAL COLECTIVA

**DECLARACIÓN DE WITER JIMENEZ EN APOYO
DE LA MOCIÓN PARA LA CONCESIÓN DE
INCENTIVOS**

1 Yo, Witer Jiménez, declaro lo siguiente:

2 1. Soy uno de los demandantes nombrados en este caso. Presento esta Declaración en
3 apoyo de la Moción de los Demandantes para la concesión de incentivos.

4 2. Conozco personalmente los hechos expuestos en esta Declaración. En caso de ser
5 llamado como testigo, podría testificar, y lo haría de forma competente, sobre los asuntos aquí
6 expuestos.

7 **Decisión y esfuerzo para sumarse a la demanda**

8 3. He sido parte de este caso durante más de ocho años. Decidí sumarme a este caso
9 porque me parecía que los jugadores de las ligas menores no recibían una remuneración adecuada.
10 Comprendí desde el principio que ser un demandante nombrado no me proporcionaría un gran
11 beneficio financiero y que no había garantía de éxito.

12 4. A pesar de ello, me incorporé al caso y le dediqué mucho tiempo. Era un tiempo que
13 podía haber dedicado a otros menesteres, con mi familia y amigos o con el trabajo. En cambio, lo
14 dediqué a garantizar el mejor resultado posible para todos mis colegas de las ligas menores.

15 5. Presenté mi denuncia el 21 de abril de 2014. Antes de hacerlo, tuve múltiples llamadas
16 con mis abogados en este caso e intercambié múltiples correos electrónicos. Proporcioné información
17 sobre mi carrera, mis rutinas de trabajo y mi salario, lo que ayudó a mis abogados a redactar mi
18 demanda y a comprender mejor el caso. También comencé el proceso de búsqueda de documentos
19 relacionados con el empleo y los proporcioné a mis abogados.

20 6. Revisé el proyecto de denuncia antes de presentarlo para asegurarme de que los
21 hechos eran correctos. Me comuniqué con mis abogados sobre el proyecto de denuncia y sobre cuáles
22 serían los siguientes pasos.

23 7. Calculo que este proceso previo a la presentación consumió unas cinco horas de mi
24 tiempo.

25 **Descubrimiento**

26 8. Fui objeto de un amplio proceso de investigación en el caso. Se me entregaron dos
27 series de solicitudes de producción. Tuve numerosas llamadas telefónicas e intercambié numerosos
28

1 correos electrónicos con mis abogados para discutir las solicitudes de presentación y mi obligación de
2 buscar y presentar documentos relacionados con mi carrera.

3 9. Me tomé muy en serio esta responsabilidad. Busqué documentos en papel en muchos
4 lugares durante varios días.

5 10. También asistí a mis abogados en la búsqueda de documentos electrónicos. Me reuní
6 con miembros del equipo de mis abogados o con un proveedor contratado por ellos para que me
7 ayudara a recopilar los documentos electrónicos. A menudo era una tarea tediosa que implicaba varios
8 pasos y muchas conversaciones a lo largo de varios días. También significaba que estaba abriendo
9 archivos privados para que pudieran ser buscados. Lo permití porque creía en el caso y era importante
10 para el éxito del mismo.

11 11. Como el caso duró tanto tiempo, tuve que volver a buscar los documentos en una
12 fecha posterior para ver si se podía encontrar algún documento nuevo. Lo discutí con mis abogados
13 en múltiples y largas llamadas telefónicas y dediqué mucho tiempo a este proceso de búsqueda
14 complementaria.

15 12. En total, calculo que pasé unas cinco horas realizando tareas relacionadas con la
16 búsqueda de documentos.

17 13. También se me entregaron tres juegos de interrogatorios. Tuve llamadas telefónicas
18 con mis abogados para discutir estos interrogatorios y las respuestas, y también intercambié correos
19 electrónicos. He revisado las respuestas al interrogatorio para asegurarme de su exactitud. Las
20 respuestas a mis interrogatorios fueron modificadas varias veces, y las revisé cada vez. Calculo que
21 pasé unas tres horas relacionadas con la respuesta a los interrogatorios.

22 14. Me senté para una declaración en este caso. Tuve múltiples llamadas con mis abogados
23 e intercambié mensajes para discutir la declaración. También tuve múltiples sesiones de preparación
24 para la declaración. Revisé los documentos para preparar la declaración. Calculo que el tiempo
25 dedicado a la preparación de la declaración consumió unas cuatro horas.

26 15. Luego viajé a mi declaración. Eso llevó unos 30 minutos en cada sentido.
27
28

17. Calculo que el tiempo total dedicado a mi declaración fue de unas 16 horas.

18. Anteriormente proporcioné una declaración en apoyo de la Moción de los Demandantes para la Notificación a la Clase y la Certificación Condicional de conformidad con la Ley de Normas Laborales Justas. Proporcioné información a mis abogados para que pudieran redactar esta declaración. Antes de firmarlo, lo revisé para asegurarme de su exactitud. Calculo que pasé alrededor de una hora y media relacionada con esa declaración.

19. A lo largo de mis años de participación en el caso, me he mantenido informado del progreso a través de discusiones y comunicaciones escritas con mi abogado y la revisión de los archivos del tribunal. He recibido llamadas periódicas y he intercambiado mensajes regulares sobre el caso en todo momento. Esto ha incluido discusiones sobre importantes presentaciones y la revisión de las principales órdenes del caso. Calculo que he dedicado 40 horas a mantenerme informado en general de lo que ocurriría en el caso y a discutir lo que vendría después.

20. A medida que se acercaba la fecha del juicio, empecé a recibir llamadas y a intercambiar mensajes para hablar de mi posible testimonio en el juicio. Empecé a revisar los documentos para prepararme, incluyendo la transcripción de mi declaración, las declaraciones y las respuestas a los interrogatorios. Tuve una sesión de preparación con mis abogados para prepararme para testificar en el juicio. Calculo que he invertido unas dos horas en este proceso.

21. Mis abogados también se comunicaron conmigo sobre la mediación y las posibilidades de acuerdo. Recibí el acuerdo de conciliación y lo revisé antes de firmarlo. Calculo que he invertido alrededor de una hora en este proceso.


3

23. Asumí de buen grado estos riesgos y cargas porque estaba convencido de que había que mejorar las condiciones de trabajo de los jugadores de las ligas menores, incluida la forma de pagar a los jugadores. Asumí la carga de abrirme a un descubrimiento intrusivo y prolongado y a la posibilidad de riesgos para la reputación porque era lo correcto. Estoy orgulloso de haber desempeñado un papel importante en este caso histórico, y estoy orgulloso del resultado obtenido para miles de compañeros.

24. En vista de lo anterior, solicito respetuosamente un premio de incentivo en reconocimiento del servicio que presté en el caso. Creo que se justifica en este caso por el tiempo que he dedicado a este largo, muy publicitado y polémico caso, y por mi compromiso de llevarlo hasta el final.

Declaro bajo pena de perjurio que lo anterior es cierto y correcto.

Ejecutado en 10/24/2022

DocuSigned by:

 F83CB13A117148D



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The translator besides meeting the residency and citizenship criteria has also been established, through testing, to be a competent professional translator and the work has been subject to a review and edit by an independent and similarly qualified editor fluent in both languages

Name: Amanda Jean Best

Signature:

Title: Office Manager

Date: 10/20/2022

State of Utah, County of Salt Lake On this 20th day of October, in the year 2022, before me, Jacqueline Rodriguez Pinon, a notary public, personally appeared, Amanda Jean Best, proved on the basis of satisfactory evidence to be the person(s) whose name is subscribed to this instrument, and acknowledged he/she executed the same.

Witness my hand and official seal.

Notary Name Jacqueline Rodriguez Pinon Signature

