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Electronically
FILED
by Superior Court of California, County of San Mateo
ON 2/21/2023
By /s/ Vanessa Jimenez
Deputy Clerk

8 **SUPERIOR COURT OF CALIFORNIA**
9 **COUNTY OF SAN MATEO**
10

11 BRAD BARUH, KATHY BARUH,
12 CHARLES BOLTON, ELDRIDGE GRAY,
13 JOHN LOCKTON, DAVID MARQUARDT,
14 PAUL ROCHESTER, ARTHUR
15 STROMBERG, CHARLES SYERS,
individually and on behalf of all others
similarly situated,

16 Plaintiffs and Petitioners,

17 v.

18 TOWN OF HILLSBOROUGH and DOES 1-
19 100, inclusive,

20 Defendants and Respondents.
21

Case No. 16CIV02284

**DECLARATION OF CHARLES BOLTON
IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND
SERVICE AWARD**

Date: March 20, 2023

Time: 3:00 p.m.

**Dept.: Hon. V. Raymond Swope
Dept. 23**

22 I, Charles Bolton, hereby declare:

23 1. I am an adult, over 18 years old. I am a named plaintiff and an appointed class
24 representative in the above-entitled action. I have firsthand knowledge of the information set forth
25 in this declaration, and if called to testify I can and will do so.

26 2. Bringing this case and pursuing it for almost six years was not an easy undertaking
27 and it involved a great deal of effort and stress. Both prior to and after being appointed a class
28 representative by the Court, I have pursued this action with the best interests of the class in mind.

1 I have given a significant amount of my time in pursuit of this lawsuit, and I believe that our work
2 has reaped a real benefit to the class.

3 3. I joined this suit at its inception after having lunch with John Lockton where I
4 learned that my incredibly high water bills were subsidizing my neighbors' lower ones. I decided
5 then and there to join the potential lawsuit John was working to get off the ground.

6 4. During the years that this lawsuit has been pending, I have remained a committed
7 and active participant. To that end, I have reviewed many of the Town's water rate and drought
8 records, I have reviewed all of plaintiffs' filings in the case as well as those of the Town, I have
9 met with friends, neighbors, and members of the community to discuss the lawsuit and answer
10 questions, I have attended court hearings, a settlement conference, and mediation, and I have been
11 involved in the settlement discussions thereafter. Over the years, I estimate that I have dedicated
12 over 40 hours of my own time in pursuit of this case.

13 5. During the course of this lawsuit, I have heard from many members of our
14 community who did not support our lawsuit and did not care for my involvement in it. While this
15 pressure caused me stress, it did not deter me in my efforts to seek the best result possible for the
16 class.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true.

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Dated: Feb 14, 2023

By: Charles Bolton
Charles Bolton (Feb 14, 2023 12:04 PST)
Charles Bolton







Hillsborough Case - Declaration to Sign

Final Audit Report

2023-02-14

Created:	2023-02-14
By:	Beau Burbidge (beau@burbidgemitchell.com)
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"Hillsborough Case - Declaration to Sign" History

-  Document created by Beau Burbidge (beau@burbidgemitchell.com)
2023-02-14 - 6:40:07 PM GMT- IP address: 65.181.55.114
-  Document emailed to charliebolton@msn.com for signature
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-  Signer charliebolton@msn.com entered name at signing as Charles Bolton
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-  Document e-signed by Charles Bolton (charliebolton@msn.com)
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PROOF OF SERVICE

Baruh, et al. v Town of Hillsborough
San Mateo County Superior Court Case No. 16CIV02284

My business address is 50 Francisco Street, Suite 460, San Francisco, California 94133. I am employed in the County of San Francisco, where this mailing occurs. I am over the age of 18 years and not a party to the within cause. On the date set forth below, I served the foregoing document(s) described as:

DECLARATION OF CHARLES BOLTON IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND SERVICE AWARD

on the following person(s) in this action by placing a true copy thereof enclosed in a sealed envelope addressed as listed below.

[X] [X] BY ELECTRONIC SERVICE – E-MAIL On **February 21, 2023**, based on an agreement or stipulation of the parties to accept electronic service and/or CCP §1010.6(e), I caused said document(s) to be sent via electronic mail to the email addresses listed below from my email address: serena@whk-law.com.

Harriet A. Steiner, Esq. James Gilpin, Esq. Christopher Diaz, Esq. BEST BEST & KRIEGER LLP 500 Capitol Mall, Suite 1700 Sacramento, CA 95814 Tel: (916) 325-4000 Fax: (916) 325-4010 <i>Attorneys for Defendant Town of Hillsborough</i>	harriet.steiner@bbklaw.com James.Gilpin@bbklaw.com Christopher.Diaz@bbklaw.com Jannine.South@bbklaw.com
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on **February 21, 2023** at San Francisco, California.

By: *Serena L. Broussard*
Serena L. Broussard