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9 *Attorneys for Plaintiff Daniel Blanco, individually,*
10 *and on behalf of a class of similarly situated individuals*

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

12 **COUNTY OF SAN DIEGO**

13 DANIEL BLANCO, individually, and on
behalf of a class of similarly situated
14 individuals,

15 Plaintiffs,

16 v.

17 SEAWORLD PARKS AND
ENTERTAINMENT, INC., a Delaware
18 corporation, SEA WORLD, LLC, a
Delaware limited liability company, and
DOES 1-5, inclusive,

19 Defendants.

No. 37-2023-00008529-CU-BT-CTL

*Assigned to the Hon. Gregory W. Pollack,
Dept. 71*

DECLARATION OF ETHAN PRESTON

Date: August 15, 2025
Time: 9:30 a.m.

Action Filed: February 28, 2023
Trial Date: Not Set

20 1. My name is Ethan Preston. I am an attorney at law licensed to practice before all
21 of the courts of the State of California.

22 2. I am counsel of record for Plaintiff Daniel Blanco ("Blanco"), and have personal
23 knowledge of all of the facts set forth in this declaration.

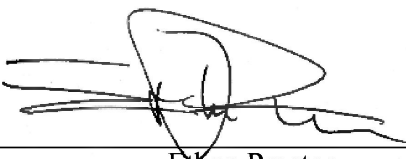
24 3. I have been practicing law since I graduated from the Georgetown University Law
25 Center in 2001, have been a member of the California bar since 2009, and have successfully
26 litigated numerous complex consumer actions on behalf of plaintiffs. Since 2007, essentially all
27 of my law practice has been devoted to litigating class actions on behalf of consumers. Since
28

1 2009, as the principal of Preston Law Offices, I have acted independently as lead counsel or co-
2 lead counsel in *Wang v. Asset Acceptance, LLC*, No. 09-4797 (N.D. Cal. Nov. 17, 2011),
3 *DuFour v. Be, LLC*, No. 09-cv-03770 (N.D. Cal. May 20, 2013), *Holmes v. NCO Financial*
4 *Services, Inc.*, No. 10-2543 (S.D. Cal. June 23, 2014), *Wang v. Bank of America, N.A.*, No. CGC-
5 12-526452 (Sup. Ct. San Francisco Aug. 8, 2014), *Lofton v. Verizon Wireless (VAW) LLC*, No.
6 13-05665 (N.D. Cal. Jan. 28, 2016), *Meyer v. PYOD, LLC*, No. 37-2014-00008110-CU-BT-NC
7 (Sup. Ct. San Diego Jan. 6, 2017), and was appointed co-lead counsel in the multi-district
8 litigation case, *In re Portfolio Recovery Associates, LLC Telephone Consumer Protection Act*
9 *Litigation*, No. 11- 2295 (S.D. Cal. June 23, 2016).

10 4. I support the Court’s approval of the Settlement. I believe the Settlement is fair,
11 adequate, and reasonable in light of the uncertainties regarding recovery and restitution, potential
12 class certification issues surrounding differences in the disclosures made to consumers when they
13 purchased annual passes, the Defendants’ cancellation mechanism, and other potential
14 individualized inquiries, and the risks inherent in further litigation.

15 5. Pursuant to Code of Civil Procedure section 2015.5, I declare under penalty of
16 perjury under the laws of California that the foregoing is true and correct.

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Dated: July 23, 2025 By:  _____
Ethan Preston