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

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

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

Plaintiffs,

v.

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

Defendants.

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

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

**DECLARATION OF ZACK
BROSLAVSKY IN SUPPORT OF
UNOPPOSED MOTION FOR
ATTORNEYS' FEES, COSTS AND
SERVICE AWARD FOR CLASS
REPRESENTATIVE**

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

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

1 1. My name is Zack Broslavsky. I am an attorney at law licensed to practice before
2 all of the courts of the State of California. I am counsel of record for Plaintiff Daniel Blanco
3 (“Blanco”), and have personal knowledge of all of the facts set forth in this declaration.

4 2. I graduated from UCLA School of Law in 2006. Between 2006 and 2013, I was a
5 litigation associate at Rutan & Tucker. From 2014 through the present, I have been a partner in
6 Broslavsky & Weinman, LLP.

7 3. While the majority of my firm’s practice is focused on individual plaintiff-side
8 employment claims, I have also done substantial class action work. I was appointed as class
9 counsel in *Cosio v. International Performing Arts Academy LLC et al.*, San Francisco Sup. Ct.
10 Case No. CGC16551337, *Smith et al. v. HR Direct, Services et al.*, San Bernardino County Sup.
11 Ct. Case No. CIVDS1901660, and *Salas et. al. v. J&S Restaurants, Inc. et. al.*, Ventura County
12 Sup. Ct. Case No. 56-2019-00526959-CU-OE-VTA, and *Velasquez et. al. v. Team, Blaze et. al.*,
13 Orange County Superior Court Case No. 30-2021-01187932-CU-OE-CXC.

14 4. Blanco’s counsel in this action are Parasmo Lieberman Law, Preston Law
15 Offices, and myself. We have zealously represented the interests of Blanco and the putative
16 class, effectively collaborating and working together.

17 5. I have been actively involved in all phases and aspects of this litigation. Phase I
18 of the litigation (Initial Investigation, Research, and Drafting the Complaint) commenced when
19 in early December 2022, my firm was contacted by a consumer complaining about the annual
20 passes to SeaWorld San Diego that he purchased being auto-renewed. Over the next several
21 months, Parasmo Lieberman Law and I thoroughly researched the potential claims pertaining to
22 SeaWorld’s auto-renewal practices. I personally interviewed numerous putative class members
23 about their experience with annual passes to SeaWorld San Diego and reviewed relevant
24 documentation provided by them.

25 6. Ms. Parasmo and I investigated the purchase flow for annual passes on
26 SeaWorld’s website and mobile application over the years and preserved our findings. I have
27 also taken part in all other factual and legal research that was performed prior to filing this
28 lawsuit, including review of online complaints, media coverage re: SeaWorld’s autorenewal

1 practices, research of prior litigation against SeaWorld, research relating to recent amendments
2 to the California Automatic Renewal Law (“ARL”), and the relevant ARL case law. Based on the
3 extensive investigation and research, we drafted a detailed complaint which was filed on
4 February 28, 2023. In total, I spent hours 147.6 hours working on Phase I.

5 7. During Phase II of the litigation (Discovery and Related Motion Practice), I have
6 taken part in preparing discovery served on Defendants and the protracted meet and confer
7 efforts from September of 2023 until July 2024 entailing multiple meet and confer letters and
8 phone conferences. I conducted legal research and analysis to evaluate the merits of and
9 rebuttals to Defendants’ objections to discovery, such as objections to a *Belaire* notice and to
10 document requests pertaining to customer complaints, pertinent internal communications,
11 policies, procedures, scripts, and databases with relevant information, inter alia. I assisted in
12 drafting the portion of the *ex parte* application (filed on July 15, 2024) that addressed issues with
13 Defendants’ document production to date and the *Belaire* notice. Following the *ex parte* hearing
14 and the Court’s ruling, I took part in meeting and conferring on the scope and parameters of the
15 *Belaire* notice and other discovery issues remaining.

16 8. I took the lead in drafting the responses and producing documents to Defendants’
17 own extensive discovery. I worked closely with the Plaintiff Blanco to prepare the responses and
18 gather numerous documents requested by Defendants. My co-counsel and I met and conferred
19 with Defendants multiple times on the alleged deficiencies in Plaintiff Blanco’s responses and
20 production, drafted supplemental responses, and produced further documents. I researched the
21 merits of and rebuttals to Defendants’ arguments regarding their discovery requests to which we
22 objected.

23 9. I also continued to personally interview other putative class members, and
24 perform further factual and legal research and investigation as the case progressed, including
25 monitoring customer comments relating to Defendants’ autorenewal practices and recent
26 developments in the ARL case law. I spent 161.8 hours working on Phase II.

27 10. During Phase III (Mediation, Settlement and Settlement Approval), the parties
28 exchanged targeted informal discovery as a condition of and in preparation for mediation. I

1 assisted in this process and reviewed and analyzed the latest data produced by Defendants. I had
2 a significant role in drafting of the mediation brief. On November 20, 2024, I attended the
3 mediation in person. I then assisted in the subsequent finalizing of the settlement agreement.

4 11. After the settlement agreement was finalized, I helped prepare and finalize all the
5 motion for preliminary approval paperwork. I also took part in overseeing implementation the
6 notice program, including email notice, mail notice, settlement website, and press release. I
7 spent hours 88.2 hours working on Phase III.

8 12. In total, I have expended at least 397.3 hours working on this case. This does not
9 include additional work that can be considered duplicative. My hours also do not include the
10 time I have spent and will continue to spend drafting the motion for final approval, as well as
11 preparing the present motion.

12 13. My current billing rate is seven hundred dollars (\$750.00) per hour. In *Velasquez*
13 *et. al. v. Team, Blaze et. al.*, Orange County Superior Court Case No. 30-2021-01187932-CUOE
14 -CXC, which was filed 2 years before this lawsuit, the Court approved my then-requested rate of
15 \$700. The rate of \$750 is also well below the benchmark rates set forth in the Laffey Matrix for
16 attorneys with my experience level. As such, my lodestar is \$298,200.

17 14. During the pendency of this litigation, my office had to decline other class action
18 work so that sufficient time can be dedicated to this case and to our single-plaintiff cases.

19 15. My office has incurred \$6,047.14 in costs, which consist of \$2,018.71 in filing
20 and service charges, \$3,968.33 in my office's share of the mediation fee, and \$65.10 in research
21 costs. These charges were necessarily incurred and are reasonable in the amount.

22 16. I believe that the settlement for the consideration and on the terms set forth in the
23 Settlement Agreement is fair, reasonable, and adequate, and is in the best interest of the Class.
24 My opinion is based on my class action experience, familiarity with all the facts of this case, the
25 benefits available under the settlement, and the expense and risks of continued litigation,
26 including the potential for Plaintiff Blanco not prevailing on the merits, denial of certification,
27 and/or appeals by Defendants.

28 17. Pursuant to Code of Civil Procedure section 2015.5, I declare under penalty of

1 perjury under the laws of California that the foregoing is true and correct.

2 Executed on July 18, 2025, at Los Angeles, California.

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Zack Broslavsky

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