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*Attorneys for Plaintiffs, Settlement Class  
Representatives, and Settlement Class Members*

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

CHRISTOPHER O'BRIEN and TIFFANY  
KIPIKASHA, individually and on behalf of all  
others similarly situated,

Plaintiffs,

vs.

SUNSHINE MAKERS, INC., a California  
Corporation,

Defendant.

Case No.: CIV-SB-2027994  
Case Filed: December 18, 2020  
*Assigned to the Hon. David Cohn*

**DECLARATION OF CHRISTOPHER D.  
MOON IN SUPPORT OF PLAINTIFFS'  
MOTION TO FILE UNDER SEAL  
UNREDACTED VERSIONS OF  
PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT, MOTION FOR AWARD  
OF ATTORNEYS' FEES AND COSTS,  
AND DECLARATION OF  
CHRISTOPHER D. MOON ISO FINAL  
APPROVAL MOTION**

Hearing Information  
Date: September 21, 2021  
Time: 10:00 a.m.  
Dept.: S-26

**DECLARATION OF CHRISTOPHER D. MOON**

1  
2 1. I am a Managing Shareholder at Moon Law APC (“**Moon**”), counsel of record for  
3 Plaintiffs Christopher O’Brien, Tiffany Kipikasha, and Michelle Moran (collectively, “**Plaintiffs**”).  
4 I make the following statements based on my own personal knowledge, except where indicated as  
5 based upon information and belief, and if called to testify thereto, I could and would do so  
6 competently.

7 2. I make this declaration in support of Plaintiffs’ Motion to File Under Seal Unredacted  
8 Versions of Plaintiffs’ Motion for Final Approval of Class Action Settlement, Motion for Award of  
9 Attorneys’ Fees and Costs, and Declaration of Christopher D. Moon ISO of Final Approval of Class  
10 Action Settlement.

11 3. In the course of discovery and settlement negotiations in the instant matter, Defendant  
12 produced sales data for the Simple Green “Non-Toxic” products that are the subject of this action  
13 and of Plaintiffs’ Motion for Final Approval of Class Action Settlement (“Final Approval Motion”);  
14 Motion for Award of Attorneys’ Fees and Costs (“Fees and Costs Motion”); and Declaration of  
15 Christopher D. Moon in Support of Final Approval of Class Action Settlement, Motion for Award  
16 of Attorneys’ Fees and Costs, and Motion for Service Awards to Settlement Class Representatives  
17 (“Moon Declaration”). The sales data describes the total units sold and total gross sales, for each  
18 fiscal year, for an approximately five-year period. Defendant designated the sales data as “highly  
19 confidential” under the terms of the confidentiality agreement executed by the Parties, which  
20 prohibits public use or disclosure of such information. As such, Plaintiffs are required to file,  
21 pursuant to Cal. R. Ct. 2.551, the instant motion to seal the portions disclosing sales figures in  
22 Plaintiffs’ Final Approval Motion, Fees and Costs Motion, and Moon Declaration. Plaintiffs only  
23 request extremely limited redactions in the documents, at the locations specified, of sales figures  
24 derived from Defendant’s designated highly confidential materials, as follows:

<b>Document</b>	<b>Page and Line Citation</b>	<b>Description of Redacted Information</b>
MPA ISO Final Approval Motion	Page 4, Line 27 to Page 5, Line 2	Sales Figures

1	MPA ISO Final Approval	Page 10, Lines 20-26	Sales Figures
2	Motion		
3	MPA ISO Final Approval	Page 11, Lines 2-3	Sales Figures
4	Motion		
5	MPA ISO Final Approval	Page 11, Lines 4-5	Sales Figures
6	Motion		
7	MPA ISO Final Approval	Page 11, Lines 7-13	Sales Figures
8	Motion		
9	MPA ISO Final Approval	Page 14, Lines 2-4	Sales Figures
10	Motion		
11	MPA ISO Fees and Costs	Page 4, Line 20	Sales Figures
12	Motion		
13	MPA ISO Fees and Costs	Page 10, Line 6	Sales Figures
14	Motion		
15	MPA ISO Fees and Costs	Page 11, Lines 9-10	Sales Figures
16	Motion		
17	MPA ISO Fees and Costs	Page 11, Lines 12-13	Sales Figures
18	Motion		
19	MPA ISO Fees and Costs	Page 12, Lines 14-15	Sales Figures
20	Motion		
21	Moon Declaration ISO Final	Page 7, Lines 8-22	Sales Figures
22	Approval Motion and Fees		
23	and Costs Motion		
24	Moon Declaration ISO Final	Page 11, Lines 8-12	Sales Figures
25	Approval Motion and Fees		
26	and Costs Motion		

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Moon Declaration ISO Final Approval Motion and Fees and Costs Motion	Page 18, Lines 15-17	Sales Figures
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4. I caused to be served on all counsel of record unredacted versions of the foregoing documents.

I declare the foregoing is true and correct under penalty of perjury under the laws of the State of California and the United States of America.

Executed this 27<sup>th</sup> day of August, 2021.

/s/ Christopher D. Moon  
CHRISTOPHER D. MOON