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*Attorneys for Plaintiffs Shannon Ray, Khala Taylor,  
Peter Robinson, Katherine Sebbane, and Rudy Barajas  
Individually and on Behalf of All Those Similarly Situated*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

SHANNON RAY, KHALA TAYLOR, PETER  
ROBINSON, KATHERINE SEBBANE, and  
RUDY BARAJAS Individually and on Behalf of  
All Those Similarly Situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC  
ASSOCIATION, an unincorporated association,

Defendant.

Case No. 1:23-cv-00425

**CLASS ACTION**

**NOTICE REGARDING ABSENCE OF  
OBJECTIONS TO MOTION FOR  
FINAL APPROVAL AND MOTION  
FOR ATTORNEYS' FEES,  
LITIGATION COSTS, AND SERVICE  
AWARDS**

Judge: Hon. William B. Shubb  
Courtroom: 5  
Date: May 11, 2026  
Time: 1:30 PM

1 Plaintiffs respectfully submit this Notice that the deadlines for class members to object to  
2 the Motion for Final Approval (ECF 171) or the Motion for Attorneys’ Fees, Litigation Costs, and  
3 Service Awards (ECF 172) have now passed, and no objections have been submitted.

4 As previously described in the Declaration of Eric Miller, ECF 171-1, the extensive Notice  
5 Program approved by the Court was fully implemented. The deadline for class members to object  
6 to final approval was March 21, 2026, and no objections were filed with the Court or submitted to  
7 the Claims Administrator or Co-Lead Counsel. *See* Docket (showing no objections); Ex. 1,  
8 Supplemental Declaration of Eric Miller at ¶¶ 3-5. The deadline for class members to object to the  
9 Motion for Attorneys’ Fees, Litigation Costs, and Service Awards was April 20, 2026, and,  
10 similarly, no objections were filed or submitted. *See* Docket (showing no objections); Ex. 1,  
11 Supplemental Declaration of Eric Miller at ¶¶ 3-5. In addition, as previously noted, *see* ECF 171  
12 at 21, no class members have opted out since the Settlement’s terms were announced.

13 The absence of any objection supports approval of both motions. *See, e.g., Nat’l Rural*  
14 *Telecomms. Coop. v. DIRECTV, Inc.*, 221 F.R.D. 523, 529 (C.D. Cal. 2004) (“[T]he absence of a  
15 large number of objections to a proposed class action settlement raises a strong presumption that  
16 the terms of a proposed class settlement action are favorable to the class members.”); *In re*  
17 *Capacitors Antitrust Litig.*, 2023 WL 2396782, at \*2 (N.D. Cal. Mar. 6, 2023) (granting fee motion  
18 and noting that “[n]o class member or other person has objected to the proposed fees award”);  
19 *Perez v. Rash Curtis & Assocs.*, 2020 WL 1904533, at \*17 (N.D. Cal. Apr. 17, 2020) (fact that “no  
20 objections were received from any class members ... weighs in favor of an upward departure from  
21 the 25% benchmark”).

22 Plaintiffs also note an inadvertent transposition of two entries on Exhibit A to the  
23 Declaration of Dennis Stewart (ECF 172-1). The hourly rate and lodestar entries listed for attorney  
24 Tony Stauber should be for attorney Emily Egart and *vice versa*. The transposition has no effect  
25 on the previously reported total lodestar figures for Gustafson Gluek PLLC. Plaintiffs are filing  
26 herewith, as Exhibit 2, the Supplemental Declaration of Dennis Stewart Filed on Behalf of  
27 Gustafson Gluek PLLC in Support of Application for Award of Attorneys’ Fees and Expenses,  
28 which includes a corrected version of Exhibit A.

**CONCLUSION**

For the foregoing reasons, and those set forth in the Motion for Final Approval (ECF 171) and the Motion for Attorneys' Fees, Litigation Costs, and Service Awards (ECF 172), Plaintiffs respectfully request that the Court grant the motions.

DATED: April 27, 2026

Respectfully submitted,

**GUSTAFSON GLUEK PLLC**

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**FAIRMARK PARTNERS, LLP**

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(*pro hac vice*)  
Jamie Crooks, CA Bar No. 310447  
(*pro hac vice*)  
Yinka Onayemi, NY Bar No. 5940614  
(*pro hac vice*)  
Michael Goldberg, MA Bar No. 709203  
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6 **KIRBY McINERNEY LLP**

7 By: /s/ Robert J. Gralewski  
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27 Telephone: (619) 818-0644  
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*Attorneys for the Class*

# Exhibit 1

## Supplemental Declaration of Eric Miller

Dennis Stewart, CA Bar No. 99152  
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v.

NATIONAL COLLEGIATE ATHLETIC  
ASSOCIATION, an unincorporated association,

Defendant.

Case No. 1:23-cv-00425

**SUPPLEMENTAL DECLARATION OF  
ERIC J. MILLER REGARDING  
ABSENCE OF OBJECTIONS**

Judge: Hon. William B. Shubb

1 I, Eric J. Miller, declare as follows:

2 1. I am the Senior Vice President of A.B. Data, Ltd.’s Class Action Administration  
3 Company (“A.B. Data”), whose corporate office is located in Milwaukee, Wisconsin. My business  
4 address is 5080 PGA Boulevard, Suite 209, Palm Beach Gardens, Florida 33418, and my telephone  
5 number is 561-336-1801.

6 2. This Declaration is based upon my personal knowledge and upon information  
7 provided by my associates and staff members. I have personal knowledge of the facts set forth and  
8 if called as a witness, could and would testify competently thereto.

9 3. On April 6, 2026, I executed my original declaration (ECF 171-1) stating, among  
10 other things, that as of that date, A.B. Data had not received or been made aware of any objection  
11 and/or request to speak at the Fairness Hearing.

12 4. Although objections are not to be sent to A.B. Data, nevertheless, as part of its  
13 standard procedures, A.B. Data personnel examine all emails and mail received to search for any  
14 objections received.

15 5. To date, A.B. Data has not received any objections to the Motion for Final Approval  
16 or the Motion for Attorneys’ Fees, Litigation Costs, and Service Awards, filed on April 6, 2026.

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

18 Executed this 27th day of April 2026.

19 

20 \_\_\_\_\_  
21 Eric J. Miller

## Exhibit 2

Corrected Exhibit A to the Declaration of  
Dennis Stewart Filed on Behalf of Gustafson  
Gluek PLLC in Support of Application for  
Award of Attorneys' Fees and Expenses

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NATIONAL COLLEGIATE ATHLETIC  
ASSOCIATION, an unincorporated association,

Defendant.

No. 1:23-cv-00425-WBS-CSK

**SUPPLEMENTAL DECLARATION OF  
DENNIS STEWART FILED ON  
BEHALF OF GUSTAFSON GLUEK  
PLLC IN SUPPORT OF APPLICATION  
FOR AWARD OF ATTORNEYS' FEES  
AND EXPENSES**

Judge: Hon. William B. Shubb

1 I, Dennis Stewart, pursuant to 28 U.S.C. § 1746, declare as follows:

2 1. I am Member (“Partner”) at the Firm of Gustafson Gluek PLLC (“Gustafson  
3 Gluek” or the “Firm”). I previously submitted a declaration in support of the application for an  
4 award of attorneys’ fees and expenses/charges (“expenses”) in connection with services rendered  
5 in the above-entitled action. See Doc. 172-1.

6 2. Attached to that declaration was Exhibit A which set forth a breakdown of my  
7 Firm’s lodestar and hourly rates by each professional who worked on the case. It has come to my  
8 attention that in the previously submitted Exhibit A, the hours and rates for associate attorney Tony  
9 Stauber were incorrectly listed under associate attorney Emily Egart and the hours and rate for  
10 associate attorney Emily Egart were incorrectly listed for associate attorney Tony Stauber.  
11 Although it does not change the total number of hours or lodestar set out on Exhibit A for my firm,  
12 it is an inadvertent error that I felt should be corrected. Attached is an Amended Exhibit A (in both  
13 a redlined and a clean version).

14 3. I declare under penalty of perjury that the foregoing is true and correct. Executed  
15 this 21st day of April 2026, at San Diego, California.

16  
17  
18 \_\_\_\_\_  
19 /s/Dennis Stewart  
20 Dennis Stewart

**AMENDED EXHIBIT A***Ray, et al. v. National Collegiate Athletic Association*

No. 1:23-cv-00425-WBS-CSK

GUSTAFSON GLUEK PLLC

Inception through April 2, 2026

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Daniel E. Gustafson	(P)	343.50	\$1,400	\$480,900
Dennis Stewart	(P)	2570.30	\$1,400	\$3,598,420
Karla M. Gluek	(P)	219.70	\$1,250	\$274,625
Jason S. Kilene	(P)	253.40	\$1,100	\$278,740
Amanda M. Williams	(P)	1,027.10	\$975	\$1,001,423
Joshua J. Rissman	(P)	36.10	\$925	\$33,393
Noah Cozad	(AS)	163.10	\$575	\$93,783
Matt Jacobs	(AS)	1,952.00	\$550	\$1,073,600
<del>Tony Stauber</del> <del>Emily Egart</del>	(AS)	1,297.80	\$550	\$713,790
Abou Amara	(AS)	120.30	\$675	\$81,203
<del>Emily Egart</del> <del>Tony Stauber</del>	(AS)	609.60	\$675	\$411,480
Jennifer Anderson	(AT)	499	\$550	\$274,450
Leona Ajavon	(AT)	96.10	\$550	\$52,855
Kajon Pompey	(AT)	657.50	\$450	\$295,875
<b>Paralegals</b>				
Melanie Castro	(Pa)	1,180.70	\$350	\$413,245
Chelsea Noble	(Pa)	99.80	\$325	\$32,435
John Sievers	(Pa)	200.90	\$375	\$75,338
Sarah Moen	(Pa)	45.50	\$425	\$19,338
<b>Other</b>				
Betty Annan-Noonoo	(LC)	24.50	\$200	\$4,900
<b>TOTAL</b>		<b>11,396.90</b>		<b>\$9,209,793</b>

(P) Partner

(AS) Associate

(AT) Attorney

(Pa) Paralegals

(LC) Law Clerk

**AMENDED EXHIBIT A***Ray, et al. v. National Collegiate Athletic Association*

No. 1:23-cv-00425-WBS-CSK

GUSTAFSON GLUEK PLLC

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<b>TOTAL</b>		<b>11,396.90</b>		<b>\$9,209,793</b>

(P) Partner

(AS) Associate

(AT) Attorney

(Pa) Paralegals

(LC) Law Clerk