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6 *Counsel for Plaintiff*
and Proposed Class Counsel
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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
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12 SARGIS ISAYAN, on behalf of himself, all
13 others similarly situated, and the general
public,

14 Plaintiff,

15 v.

16 CEDAR FAIR, L.P., a Delaware limited
17 partnership; CEDAR FAIR MANAGEMENT,
INC., an Ohio corporation; SIX FLAGS
18 ENTERTAINMENT CORPORATION, a
Delaware corporation; and JOHN DOES 1—
19 10,

20 Defendants.
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Electronically FILED by
Superior Court of California,
County of Los Angeles
8/06/2026 4:59 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By J. Covarrubias, Deputy Clerk

Case No. 24STCV16212
Hon. Elaine Lu, Dept. 9

**Declaration of Thomas Warren in support of
Plaintiff's Unopposed Supplemental Briefing
on Motion for Preliminary Approval of Class
Action Settlement**

Date: September 17, 2026
Time: 8:30 AM
Dept.: 9

Action Filed: June 28, 2024
Trial Date: N/A

1 I, Thomas Warren, declare:

2 1. I am a partner with Warren Terzian LLP, counsel of record for the plaintiff in this
3 action.

4 2. I graduated from Harvard College in 1988 and Stanford Law School in 1992, where I
5 served as Senior Note Editor of the *Stanford Law Review*.

6 3. After that, I clerked for the Honorable Stephen V. Wilson, United States District
7 Court for the Central District of California.

8 4. I then spent nearly a decade as an Assistant United States Attorney with the U.S.
9 Department of Justice in Los Angeles, serving as the Chief of the General Crimes Section and as
10 Senior Litigation Counsel.

11 5. After leaving government service, I joined BakerHostetler LLP, where I served as the
12 national co-chair of the appellate practice for over 15 years. After that, I served as the managing
13 partner of a litigation boutique and founded Warren Terzian LLP in 2020.

14 6. I am a nationally recognized trial and appellate lawyer. Over the course of my career,
15 I have been called on by some of the country's most significant companies and highest-profile
16 individuals in cases involving hundreds of millions, and in some cases billions, of dollars. I focus my
17 practice on class action and commercial litigation, both at the trial and appellate level. I have also
18 represented high-profile individuals in high-stakes cases, and serve as a strategic analyst and brief
19 writer in bet-the-company litigation. I am currently counsel of record for plaintiffs in over fifteen
20 pending consumer class actions in California state and federal courts. In total, while at Warren
21 Terzian LLP, I have been counsel of record for plaintiffs in approximately twenty California class
22 actions.

23 7. My experience as appointed class counsel is accurately listed in Dan Terzian's
24 declaration.

25 8. In addition to my experience representing plaintiffs in class actions, I have substantial
26 experience representing defendants in class actions. These cases include:

- 27 • *Price v. Synapse Group, Inc.*, No. 37-2016-00016453-CU-MC-CTL (San Diego
28 Super. Ct.), No. 3:16-cv-01524-BAS-BLM (S.D. Cal.): automatic renewal
class action defense;

- *Rikos v. The Procter & Gamble Company*, No. 14-4088 (6th Cir.): consumer class action defense in Sixth Circuit concerning certification of classes of purchasers of probiotic Align;
- *Stammco LLC v. United Telephone Company of Ohio*, No. 08-1822, 125 Ohio St. 3d 91, 2010-Ohio-1042 (Ohio Supreme Court): obtained jurisdiction and successful reversal of lower court opinion affirming certification of class action;
- *Estate of Mikulski v. Centerior Energy Corp.*, No. 114713 (Ohio Ct. App. 8th Dist.) and *Estate of Mikulski v. Toledo Edison Co.*, 2026-Ohio-2508 (Ohio Ct. App. 6th Dist.): defense of denial of class certification on companion cases;
- *In re FirstEnergy Corp.*, No. 2:20-cv-03785-ALM-KAJ (S.D. Ohio): securities class action defense;
- *In re Upstart Holdings, Inc.*, No. 2:22-cv-02935-ALM-EPD (S.D. Ohio): securities class action defense;
- *Boynton Beach Firefighters' Pension Fund v. HCP, Inc.*, Case No. 3:16-cv-01106-JJH (N.D. Ohio): securities class action defense; and
- *Cruz v. PNC Bank, N.A.*, No. 17-3091 (6h Cir.): class action defense affirming dismissal of complaint.

9. My experience representing large companies on the defense side informs how I represent classes. In defending class actions, I have evaluated certification and merits exposure for corporate clients, advised on how defendants value and reserve against class claims, and litigated certification and merits issues. I have also handled the appellate defense of certification rulings, which requires understanding which certification records survive review and which do not. In representing plaintiffs, that experience informs my assessment of which claims are viable, what discovery is likely to be productive, how a defendant is likely to value a case, and whether a settlement offer reflects the best result reasonably obtainable for the class.

10. In my judgment, this dual perspective makes me a more effective advocate for a class than experience on either side alone would provide. Having litigated against classes, I am better able to test my own theories against the defenses that will actually be raised, to anticipate how a defendant will litigate and value the case, and to recognize when a settlement offer reflects the practical limit of what the class can obtain.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
2 and correct.

3
4 Dated: August 6, 2026



Thomas D. Warren

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am over the age of 18 and not a party to this action. My business address is 222 N. Pacific
4 Coast Highway, Suite 2000, Los Angeles, CA 90245.

5 On the undersigned date, I caused to be served the following documents:

6 **Declaration of Thomas Warren in support of Plaintiff's Unopposed**
7 **Supplemental Briefing on Motion for Preliminary Approval of Class Action**
8 **Settlement**

9 I caused the documents to be served on the interested parties:

10 Thomas McCormick
11 Christopher Ingram
12 Adam Borgman
13 VORYS, SATER, SEYMOUR
14 AND PEASE LLP
15 2211 Michelson Drive, Suite 500
16 Irvine, CA 92612
17 tnmccormick@vorys.com
18 clingram@vorys.com
19 amborgman@vorys.com

20 *Counsel for Defendants*

21 I uploaded and served the documents to the Case Anywhere repository for this case.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing
23 is true and correct.

24 Dated: August 6, 2026

25 
26 Dan Terzian