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8 **Interim Class Counsel**

10 **UNITED STATES DISTRICT COURT**
 11 **SOUTHERN DISTRICT OF CALIFORNIA**

13 IN RE FERRERO LITIGATION

CASE NO: 3:11-CV-00205 H CAB
 Pleading Type: Class Action
 Action Filed: February 01, 2011

16 **DECLARATION OF RONALD A.**
 17 **MARRON IN SUPPORT OF**
 18 **PLAINTIFFS' MOTION FOR CLASS**
 19 **CERTIFICATION**

Judge: Hon. Marilyn L. Huff
 Date: October 11, 2011
 Time: 10:30 a.m.
 Location: Courtroom 13

1 I, Ronald A. Marron, declare:

2 1. I am a member in good standing of the State Bar of California.

3 2. My work experience and education began in 1984 when I enlisted in the United
4 States Marine Corps (1984-1990), soon thereafter, I received my Bachelor of Science in Finance
5 from the University of Southern California (1991). I interned at the California Department of
6 Corporations with emphasis in consumer fraud investigations while attending Southwestern
7 University School of Law (1992-1994). I was admitted to the State Bar of California in 1995 and
8 have been a member in good standing since that time. In 1998, I started my own law firm with an
9 emphasis in consumer fraud. My firm is now known as the Law Offices of Ronald A. Marron, A
10 Professional Law Corporation.

11 3. Over the years I have acquired extensive experience in class actions and other
12 complex litigation and have obtained large settlements as lead counsel. For example, I was
13 appointed Class Counsel in *Peterman v. Midland Nat'l Life Ins.*, No. BC357194, (L.A. Co. Sup.
14 Ct.), which was litigated for over 4 years and achieved a settlement of approximately \$60 million
15 for consumers.

16 4. I also served as Class Counsel in *Clark v. Nat'l West Life Ins. Co.*, No. BC321681
17 (L.A. Co. Sup. Ct.), a class action that, after litigating the case for well over 6 years, resulted in a
18 settlement of approximately \$25 million for consumers.

19 5. In *Iorio v. Asset Mktg.*, No. 05cv00633 (S.D. Cal.), I was appointed Class Counsel
20 following class certification. Following nearly 6 years of intensive litigation, a settlement valued
21 at \$110 million was reached in *Iorio* and approved on March 3, 2011, by the Honorable Judge
22 Sammartino.

23 6. My firm was also recently appointed Class Counsel and obtained class
24 certification in the matter of *Tabares v. Equitrust Life Ins. Co.*, No. BC390195 (L.A. Co. Sup.
25 Ct.).

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1 7. My firm was also recently appointed Interim Class Counsel, together with the
2 Weston Firm, in a contested proceeding in the matter of *Chacanaca v. Quaker Oats Co.*, 2011
3 U.S. Dist. LEXIS 65023, at *8-9 (N.D. Cal. June 14, 2011) (“There is no question here that both
4 the Weston/Marron counsel . . . have ample experience handling class actions and complex
5 litigation. It is also clear that both have particular familiarity with suits involving issues of
6 mislabeling in the food industry.”).

7 I am currently counsel in a number of additional putative class actions and complex
8 cases, including:

- 9 • *Stanley v. Bayer Healthcare, LLC*, Case No. 11-cv-0862 IEG NLS (S.D. Cal.);
- 10 • *Lee v. DTG Operations, Inc.*, Case. No. 37-2011-00084470-CU-OE-CTL (C.D. Cal.);
- 11 • *Yrene v. The Quaker Oats Co.*, Case No. 5:10-CV-05398-PVT (N.D. Cal.);
- 12 • *Bruno v. Eckhart Corp., et al.*, Case No. 8:11-CV-00173-DOC-E (C.D. Cal.);
- 13 • *Pinson v. Sun Life Assurance Co. of Canada*, Case No. 37-2010-00100478 (S.D. Co.
14 Sup. Ct.);
- 15 • *Salvatierra v. Sprint Solutions*, Case No. 10-cv-2044 (S.D. Cal.);
- 16 • *Martinez v. Toll Brothers, et al.*, Case No. 09-cv-00937-CDJ (E.D. Penn.); and
- 17 • *In re Arena Pharm.*, No. 10-cv-2079 (S.D. Cal.).

18 10. Besides these cases, I have also represented plaintiffs victimized in other complex
19 cases such as Ponzi schemes, shareholder derivative suits, and securities fraud cases. I have
20 litigated hundreds of lawsuits and arbitrations against investment advisors and stockbrokers, such
21 as Morgan Stanley, LPL Financial, Merrill Lynch, Banc of America Securities, and Citigroup,
22 who placed clients into unsuitable investments, failed to diversify, and who violated the
23 Securities Acts of 1933 and/or 1934.

24 11. My firm is fully committed to prosecuting these actions against Ferrero to achieve
25 a successful outcome for the proposed Classes, and has the resources necessary to do so.

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

3

4 Executed on August 1, 2011, in San Diego, California.

5

/s/ Ronald A. Marron
Ronald A. Marron

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8 DATED: August 1, 2011

Respectfully Submitted,

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/s/Jack Fitzgerald
Jack Fitzgerald

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