UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SOL TAN TANNING & SPA LLC, CLEAN SLATE ESTHETICS, LLC, CRYSTAL LOYER dba GLOW STUDIO, DYANE THYFAULT dba LOTUS WAXING & SKINCARE STUDIO, ELITE SKIN & BODY, LLC, GLAM ESSENCE MED SPA, LLC, GLAM+GLOW BEAUTY BAR, LLC, JENNIFER SKURATOV dba SPA THIRSTY, LA CHIC BOHEME COLLECTIVE LLC dba LA CHIC BOHEME, CHAMPAGNE AESTHETICS, LLC, SAMANTHA SILVA dba ABSOLUTE SKINCARE SPA, LASHES, SKIN & WAXING WITH ALLYSON, LLC, SKYN ALCHEMY, INC., SUSIE'S BEAUTIES LLC dba BEACHSIDE BEAUTY, THE GLOW AESTHETICS 808, LLC, TOUCH OF SAM LLC, et al., On Behalf of Themselves And All Others Similarly Situated, Plaintiffs, v. HYDRAFACIAL LLC dba THE HYDRAFACIAL COMPANY, Defendant.	**Civil Case No.: 1:24-cv-08073**

DECLARATION OF RALPH B. KALFAYAN IN SUPPORT OF THE MOTION FOR ATTORNEYS' FEES AND COSTS

I, Ralph B. Kalfayan, declare:

1. I am an attorney admitted to practice law in the State of California and admitted pro hac vice to appear before this Court in the above-entitled case. I am the managing partner of The Kalfayan Law Firm, APC ("KLF"). My firm served as co-counsel with The Katriel Law Firm, P.C. in representing plaintiffs and the

settlement class. I have personal knowledge of the facts stated below, and if called upon to do so, I could and would testify competently thereto in a court of law.

2. I submit this declaration in support of the attorneys' fees and costs requested by KLF in connection with *Sol Tan Tanning & Spa LLC et al. v. Hydrafacial LLC*, Case No. 1:24-cv-08073.

3. KLF is a Professional Corporation headquartered in Del Mar, California, with its practice focus mainly on Consumer Class Action and Antitrust cases. I have been practicing law with an emphasis in complex class action litigation for over thirty-five (35) years. Over that period, I have served as sole lead counsel, or as co-lead counsel, or as liaison counsel, or as an executive committee member in numerous class action cases in several federal courts, including the Central and Northern Districts of California and the Southern District of New York, as well as the state courts of California. My resume and firm biography are attached to this declaration as Exhibit A.

4. This attorneys' fees declaration covers KLF's work performed in *Sol Tan Tanning & Spa LLC et al. v. Hydrafacial LLC*, Case No. 1:24-cv-08073, in the United States District Court for the Southern District of New York. On or about October 24, 2024, my firm and The Katriel Law Firm, P.C. filed this case on behalf of Sol Tan Tanning & Spa, LLC in a case against Hydrafacial, LLC and The Beauty Health Company, Inc. We later amended the complaint on or about June 3, 2025, to include additional plaintiffs, including Jennifer Skuratov, who was subsequently substituted by Spa Thirsty, Inc. Since its inception, my firm has performed work in the following areas:

- **Case Strategy & Motion Practice**: Researched, drafted, edited, and reviewed case documents.

- **Client Communication and Organization**: Communicated with potential clients, named plaintiffs, and potential class members.

Organized the discovery process for each; obtained required signatures and approvals; and provided necessary updates to plaintiffs.

- **Expert Witness Work**: Communicated with and provided necessary information to expert economists on potential class-wide damages.

- **Discovery**: Worked with Defendant's counsel to draft a comprehensive protective order and ESI protocols. Drafted propounded discovery, reviewed extensive production. Worked with Plaintiffs on responding to discovery propounded on each.

- **Mediation and Settlement**: Prepared for and attended settlement mediation. Researched and drafted mediation documents and mediation discovery. Reviewed Defendants' mediation materials. Worked on final settlement with Co-counsel and Defendants' counsel.

5. The following is a summary table using current rates for each timekeeper who performed work for KLF in this matter:

Timekeeper	Rate/Hr.	Hours	Totals
Ralph B. Kalfayan (Partner)	$695	351.9	$244,570.50
Ian D. Krupar (Associate)	$450	426.1	$191,745
Totals		**778**	**$436,315.50**

6. All work covered by this declaration and the time records reflect time spent on work in this matter and are reasonable and necessary for the prosecution of this action.

7. The time covered by this declaration can be further separated into the following categories:

Category	Hours	$ Total
Case Strategy & Motion Practice	266.1	$146,651.2
Client Communication and Other Correspondence	62.2	$27,977.5
Expert Witness Work	28.2	$16,144.5
Discovery	332.8	$186,689.5
Mediation and Settlement	88.7	$58,852.8
Totals	**778**	**$436,315.50**

8. The time covered by this declaration includes work performed by me, Ralph B. Kalfayan, Esq. This declaration also includes work performed by my associate, Ian D. Krupar, Esq., who, at the time the work was performed, had between two and three years of experience.

9. The rates reflected in this declaration are the same as those that have been and would be charged to paying clients for similar work.

10. In addition to the time reasonably spent on this case, KLF has incurred expenses necessary to litigate this matter totaling $41,606.46.

Expense	**Amount**
Mediation Fees	$10,930.79
Expert Costs	$19,360.47
Discovery Document Storage	$1,290.48
Research and Website Hosting	$1,314.50
Filing Fees	$221.14
Travel (to clients, to court)	$3,539.08
Class Settlement Administration	$4,950.00
Totals	**$41,606.46**

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

Executed on September 7, 2026 at San Diego, California.

By: Ralph Kalfayan

Ralph B. Kalfayan