

# EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

FATIMA BUTLER and JULIA SCHOLZ-  
PINGER, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

WHITEPAGES, INC.,

Defendant.

Case No. 19-cv-04871

Hon. Gary S. Feinerman

**DECLARATION OF ROBERTO LUIS COSTALES IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

I, Roberto Luis Costales, hereby aver, pursuant to 28 U.S.C. § 1746, that I am fully competent to make this Declaration, that I have personal knowledge of all matters set forth herein unless otherwise indicated, and that I would testify to all such matters if called as a witness in this matter.

1. I am a Partner at Beaumont Costales LLC and counsel of record for Plaintiffs in this action. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, filed herewith.

2. I was barred in the state of Louisiana in 2011 and Illinois in 2019. I am additionally a member of the trial bar of the Northern District of Illinois, the Fifth Circuit Court of Appeals of the United States, the Seventh Circuit Court of the Appeals of the United States, and the Ninth Circuit Court of Appeals of the United States.

3. My co-counsel William Beaumont and I are the partners of our firm, Beaumont Costales LLC. Our firm was founded in 2012 and we have offices in Chicago, Illinois and New

Orleans, Louisiana. We began our practice in the areas of criminal defense and personal injury, and have accrued experience in all phases of litigation, including extensive trial experience, in the course of representing many hundreds of individual litigants. Our cases have been reported by major news outlets like Popular Science, USA Today, and the Wall Street Journal.

4. Since beginning our class action practice in 2016, we have earned more than twenty-eight million dollars for class members. The majority of this work has focused on wage and hour class actions, where we previously specialized in fighting for the rights of undocumented migrant workers to receive minimum wage and overtime pay under federal law. We have also litigated class cases under the Americans with Disabilities Act, the Telephone Consumer Protection Act, the Illinois Consumer Fraud and Deceptive Practices Act, and the Illinois Biometric Information Privacy Act.

5. Our firm has been named lead class counsel in more than twenty other collective and class action cases, including but not limited to: *Novak v. Southshore Enterprises Inc.*, Case No. 2021-L-47 (Cir. Ct. McLean County 2022); *Fischer, et al. v. Instant Checkmate LLC*, No. 19-cv-04892, 2022 WL 971479 (N.D. Ill. Mar. 31, 2022); *Mohn v. Chronister Oil Company*, No. 20-L-249 (Cir. Ct. Sangamon County 2021); *Kelly v. Peryam and Kroll Research Corporation*, Case No. 20-CH-4665 (Cir. Ct. Cook County 2021); *Goldschmidt v. Rack Room Shoes, Inc.*, Case No. 18-CV-21220 (S.D. Fl. Jan. 15, 2020); *De La Rosa v. Collision Damage Experts Group, LLC*, Case No. 17-CH-14760 (Cir. Ct. Cook County 2020); *Salgado v. Greenway Resource Recovery, LLC*, Case No. 18-cv-00889 (N.D. Ill. Nov. 15, 2018); *Maldonado v. New Orleans Millworks, LLC*, Case No. 17-CV-1015 (E.D. La. Mar. 14, 2018); *Nieto v. Pizzati Enterprises, Inc.*, Case No. 16-CV-5352, (E.D. La. Mar. 28, 2017); *Murillo v. Coryell Cnty. Tradesmen, LLC*, Case No. 15-CV-3641 (E.D. La. Sept. 21, 2016); *Calix v. Ashton Marine LLC*,

Case No. 14-CV-2430 (E.D. La. March 25, 2016); *Esparza v. Kostmayer Construction*, Case No. 15-CV-4644 (E.D. La. July 1, 2016).

6. My firm has spent considerable time and resources litigating the above-captioned case. Our advocacy for the Plaintiffs and the class has been zealous, and we have won favorable opinions from the Court that ultimately benefit the rights of class members and Illinois citizens alike under the Illinois Right of Publicity Act. In my opinion, the Parties' proposed settlement represents a reasonable compromise of the dispute at issue in this litigation; and it provides considerable relief to class members in light of the risks and the novel questions presented by this case.

I declare under penalty of perjury that the above and foregoing is true and accurate.

Executed this 20th day of April 2022 at Chicago, Illinois.

/s Roberto Luis Costales  
Roberto Luis Costales