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[Additional counsel appearing on signature page]

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

SABER AHMED and JOHN
MONTELEONE, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

HSBC BANK USA, NATIONAL
ASSOCIATION, and PHH
MORTGAGE CORPORATION,

Defendants.

NO. 5:15-cv-2057-FMO-SPx

**DECLARATION OF BETH E.
TERRELL IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND COSTS
AND FOR INCENTIVE AWARDS
TO THE CLASS
REPRESENTATIVES**

Honorable Fernando M. Olguin

Complaint Filed: October 6, 2015

DATE: 12/12/2019
TIME: 10:00 a.m.
COURTROOM: First Street Federal
Courthouse, 6th Fl.,
Courtroom 6D

DECLARATION OF BETH E. TERRELL IN SUPPORT OF
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AND FOR INCENTIVE AWARDS TO THE CLASS
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CASE No. 5:15-cv-2057-FMO-SP

1 I, Beth E. Terrell, declare as follows:

2 1. I am a member of the law firm of Terrell Marshall Law Group PLLC
3 (“TMLG”), counsel of record for Plaintiffs in this matter. I am admitted to practice
4 before this Court and am a member in good standing of the bars of the states of
5 Washington and California. I respectfully submit this declaration in support of
6 Plaintiffs’ Motion for Attorneys’ Fees and Costs and for Service Awards to the
7 Class Representatives. Except as otherwise noted, I have personal knowledge of
8 the facts set forth in this declaration and could testify competently to them if called
9 upon to do so.

10 **I. CASE BACKGROUND**

11 2. Nearly three years ago, TMLG cooperated with Burke Law Offices
12 and Mazie Slater Katz & Freeman, LLC to bring claims for violations of the
13 Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227, *et seq.* against
14 Defendant HSBC in the United States District Court for the Northern District of
15 Illinois, Case No. 2016-cv-04594 (“the Monteleone Case”). We subsequently
16 dismissed the Monteleone Case without prejudice in order to join and consolidate
17 litigation with the Law Offices of Todd Friedman, P.C., Hyde & Swigart, and
18 Kazerouni Law Group, APC against both Defendants, HSBC and PHH
19 (“Consolidated Litigation”).

20 3. TMLG has invested numerous hours and advanced significant costs
21 into the investigation and prosecution of this case.

22 4. Plaintiffs have engaged in extensive discovery. Together, they served
23 Defendants nearly a dozen sets of written discovery. In response, Defendants
24 produced documents exceeding 80,000 pages. Plaintiffs also deposed Defendants’
25 representatives, Sheri Robinson Michael, Sgammato, and Denise Dickman.
26

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1 5. Obtaining discovery from Defendants was no easy feat. They resisted
2 producing any classwide discovery, including calling records and consent data
3 contained in Defendants’ systems and databases, as well as discovery relating to
4 when and how Defendants tracked consent. *See* Dkt. Nos. 85, 86, 95-98. Even after
5 Plaintiffs substantially prevailed in compelling is information, Dkt. No. 101,
6 Defendants continued to resist production. The Magistrate Judge ordered
7 additional briefing and conducted multiple, lengthy hearings to address the parties’
8 ongoing discovery disputes. Dkt. Nos. 109, 119, 133-36, 141, 154, 168. Likewise,
9 Plaintiffs responded to written discovery propounded by Defendants, and each
10 Plaintiff sat for a deposition.

11 6. The parties also engaged in substantial motion practice. Plaintiffs
12 successfully struck several of Defendants’ affirmative defenses, over Defendants’
13 objections. Dkt. No. 117. Defendants moved to strike the class allegations, which
14 Plaintiffs opposed. Dkt. Nos. 76, 77. The Court had not yet ruled on Defendants’
15 motion at the time the Magistrate Judge compelled classwide discovery. As a
16 result, following the Magistrate Judge’s ruling, Defendants filed an Ex Parte
17 Application to Stay Rulings, Dkt. No. 104, a Motion to Modify Scheduling Order,
18 Dkt. No. 105, and a Motion for Reconsideration re: Order on Motion to Compel,
19 Dkt. No. 106. On November 6, 2017, the Court denied Defendants’ Motion to
20 Strike Class Allegations and denied the Discovery Motions as moot. Dkt. No. 118.
21 And on November 13, 2017, Defendants moved for reconsideration of the Court’s
22 denial of the Discovery Motions and, alternatively, requesting “that the Court
23 facilitate an application for interlocutory appeal” pursuant to 28 U.S.C. § 1292(b).
24 Dkt. No. 121, at 3-5. The Court denied Defendants’ motion. Dkt. No. 139.

1 7. The parties engaged in settlement negotiations following the denial of
2 Defendants' motions. The Hon. Jay C. Gandhi (Ret.) conducted two full-day
3 mediations, the first on April 20, 2018, and the second on December 5, 2018.
4 During the second mediation, the parties reached an agreement on all material
5 terms and executed a Settle Term Sheet setting forth those terms. Plaintiffs
6 previously filed the Settlement Agreement, at Dkt. No. 181-3.

7 **II. FIRM BACKGROUND AND EXPERIENCE**

8 8. TMLG is a law firm in Seattle, Washington, that focuses on complex
9 civil and commercial litigation with an emphasis on consumer protection, product
10 defect, civil rights, employment, wage and hour, real estate, and personal injury
11 matters. The attorneys of TMLG have extensive experience in class actions,
12 collective actions, and other complex matters. They have been appointed lead or
13 co-lead class counsel in numerous cases at both the state and federal level. They
14 have prosecuted a variety of multi-million-dollar consumer fraud, civil rights,
15 wage and hour, and product defect class actions. The defendants in these cases
16 have included companies such as Wal-Mart, Microsoft, Best Buy, Toyota, Honda,
17 Sallie Mae, Comcast, ABM Industries, Inc., AT&T, T- Mobile USA,
18 Weyerhaeuser, Behr Products, American Cemwood, Bank of America, Discover
19 Financial Services, and Capital One.

20 9. TMLG has actively and successfully litigated class action lawsuits
21 under the Telephone Consumer Protection Act. TMLG has taken the lead in some
22 of the largest nationwide class actions filed under the TCPA, including those filed
23 against large financial institutions such as Sallie Mae, Bank of America, Discover
24 Financial Services, Capital One, and HSBC. I have been appointed co-lead counsel
25 in two of the largest MDLs involving TCPA claims, *In re Capital One Telephone*
26

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1 *Consumer Protection Act Litigation*, 1:12-cv-10064 (N.D. Illinois), and *In re*
2 *Monitronics International, Inc. Telephone Consumer Protection Act Litigation*,
3 MDL No. 1:13-MD-2493 (N.D. W. Va.).

4 10. TMLG is litigating or has settled the following TCPA class actions:

- 5 • *In re Capital One Telephone Consumer Protection Act*
6 *Litigation*—Filed on behalf of consumers who received
7 automated, prerecorded collection telephone calls on their
8 cellular telephones without their prior express consent. I
9 served as court-appointed interim co-lead counsel. The court
10 granted final approval of a \$75,455,098.74 settlement in
11 February 2015.
- 12 • *In re Monitronics International, Inc. Telephone Consumer*
13 *Protection Act Litigation*—Filed on behalf consumers who
14 received automated, prerecorded solicitation telephone calls
15 on their residential and business telephones without their
16 prior express consent within the meaning of the Telephone
17 Consumer Protection Act, 47 U.S.C. § 227 *et seq.*, the
18 Washington Automatic Dialing and Announcing Device
19 statute, RCW 80.36.400, and the Washington Consumer
20 Protection Act, RCW 19.86 *et seq.* I serve as co-lead counsel
21 in the MDL. The case settled on a class-wide basis in 2017
22 for \$28,000,000, and final approval was granted on June 12,
23 2018.
- 24 • *Abante Rooter and Plumbing, Inc. v. Pivotal Payments*
25 *Inc*— Filed on behalf of small businesses that received
26 automated solicitation telephone calls to their cell phones.
The case settled on a class-wide basis for \$9 million and
final approval was granted by the United States District
Court for the Northern District of California in October
2018.
- *Snyder v. Ocwen Loan Servicing, LLC*—Filed on behalf of
consumers who received automated collection telephone

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1 calls on their cellular telephones without their prior express
2 consent within the meaning of the Telephone Consumer
3 Protection Act, 47 U.S.C. § 227 *et seq.* The case settled on a
4 class-wide basis in 2017 for \$17,500,000, and final approval
5 was granted by the United States District Court for the
6 Northern District of Illinois in June 2019.

- 7 • *Charvat v. Plymouth Rock Energy*—Filed on behalf of
8 consumers who received automated solicitation telephone
9 calls on their cellular and residential telephones without
10 their prior express consent within the meaning of the
11 Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.*
12 and/or to telephone numbers registered on the National-Do-
13 Not-Call Registry. The case settled on a class-wide basis in
14 2016, and final approval was granted by the United States
15 District Court for the Eastern District of New York in July
16 2018.
- 17 • *Melito v. American Eagle Outfitters, Inc.*—Filed on behalf
18 of consumers who received spam text messages on their
19 cellular telephones without their prior express consent
20 within the meaning of the Telephone Consumer Protection
21 Act, 47 U.S.C. § 227 *et seq.* The case settled on a class-wide
22 basis in 2016 for \$14,500,000, and final approval was
23 granted by the United States District Court for the Southern
24 District of New York in September 2017. The United States
25 Court of Appeals for the Second Circuit affirmed the
26 settlement on April 30, 2019. *Melito v. Experian Mktg. Sols.,
27 Inc.*, 923 F.3d 85 (2d Cir. 2019).
- *Ashack v. Caliber Home Loans*—Filed on behalf of
consumers who received automated, prerecorded collection
telephone calls on their cellular telephones without their
prior express consent within the meaning of the Telephone
Consumer Protection Act, 47 U.S.C. § 227 *et seq.* TMLG
negotiated a nationwide settlement in 2016 for \$2,895,000,
and final approval was granted in June 2017.

- 1 • *Joseph v. TrueBlue Inc.*—Filed on behalf of consumers who
2 received spam text messages on their cellular telephones
3 without their prior express consent within the meaning of the
4 Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.*
5 The case settled on a class-wide basis in 2016 for
6 \$5,000,000, and final approval was granted in March 2017.
- 7 • *Gehrich v. Chase Bank USA*—Filed on behalf of consumers
8 who received automated, prerecorded collection telephone
9 calls on their cellular telephones without their prior express
10 consent within the meaning of the Telephone Consumer
11 Protection Act, 47 U.S.C. § 227 *et seq.* TMLG negotiated a
12 \$34,000,000 nationwide settlement; final approval was
13 granted in March 2016.
- 14 • *Ott v. Mortgage Investors Corporation*—Filed on behalf of
15 consumers who received automated solicitation telephone
16 calls on their cellular and residential telephones without
17 their prior express consent within the meaning of the
18 Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.*
19 TMLG negotiated a \$7,483,600 class-wide settlement and
20 final approval was granted in January 2016.
- 21 • *Wilkins v. HSBC Bank Nevada, N.A.*—Filed on behalf of
22 individuals who alleged that HSBC made prerecorded calls
23 using an automatic dialing system. The case settled on a
24 class-wide basis in 2014 for \$39,975,000, and final approval
25 was granted in March 2015.
- 26 • *Rose v. Bank of America Corp.*—Filed on behalf of
27 consumers who received automated, prerecorded collection
telephone calls on their cellular telephones without their
prior express consent within the meaning of the Telephone
Consumer Protection Act, 47 U.S.C. § 227 *et seq.* TMLG
negotiated a nationwide settlement of \$32,083,905, which
was granted final approval in August 2014.

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- 1 • *Steinfeld v. Discover Financial Services*—Filed on behalf of
2 consumers who received automated, prerecorded collection
3 telephone calls on their cellular telephones without their
4 prior express consent within the meaning of the Telephone
5 Consumer Protection Act, 47 U.S.C. § 227 *et seq.* TMLG
6 negotiated an \$8.7 million settlement, which was granted
7 final approval in March 2014.
- 8 • *Arthur v. Sallie Mae, Inc.*—Filed on behalf of consumers
9 who received automated, prerecorded collection telephone
10 calls on their cellular telephones without their prior express
11 consent within the meaning of the Telephone Consumer
12 Protection Act, 47 U.S.C. § 227 *et seq.* TMLG negotiated a
13 \$24.15 million nationwide settlement, and final approval
14 was granted in 2012.

11 III. QUALIFICATIONS OF TMLG ATTORNEYS AND STAFF

12 11. I am the lead attorney from TMLG in this case. A founding member
13 of TMLG, I concentrate my practice in complex litigation, including the
14 prosecution of consumer, defective product, and wage and hour class actions. I
15 have served as co-lead counsel on numerous multi-state and nationwide class
16 actions. I also handle a variety of employment issues including employment
17 discrimination, restrictive covenant litigation, and pre-litigation counseling and
18 advice.

19 12. I received a B.A., magna cum laude, from Gonzaga University in
20 1990. In 1995, I received my J.D. from the University of California, Davis School
21 of Law, Order of the Coif. Prior to forming TMLG in May 2008, I was a member
22 of Tousley Brain Stephens PLLC. I am a frequent speaker at legal conferences on a
23 wide variety of topics including consumer class actions, employment litigation,
24 and electronic discovery, and have been awarded an "AV" rating in Martindale
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1 Hubble by my peers. I am also actively involved in several professional
2 organizations and activities. For example, I am the President of the Public Justice
3 Foundation, an Eagle Member of the Washington State Association of Justice
4 ("WSAJ"), and I serve as the Chair of its Consumer Protection Section. I am also
5 the current Chair of the Washington Employment Lawyers Association. I have
6 been repeatedly named to the annual Washington Super Lawyers list. I have also
7 been named to their Top 100 Washington Super Lawyers list and their Top 50
8 Women Super Lawyers list.

9 13. Other TMLG attorneys who have expended substantial amounts of
10 time on this case include the following:

11 14. Jennifer Rust Murray is a founding member of TMLG. Ms. Murray
12 graduated from the University of Washington School of Law in 2005 where she
13 was a member of the Washington Law Review. Ms. Murray's law review article
14 entitled "Proving Cause in Fact under Washington's Consumer Protection Act: The
15 Case for a Rebuttable Presumption of Reliance" won the Carkeek prize for best
16 submission by a student author. Prior to law school, Ms. Murray earned a Ph.D. in
17 Philosophy from Emory University. Ms. Murray has been an active member of the
18 Washington State Bar Association since her admission to the bar in 2005. In 2010,
19 Ms. Murray was admitted to the Oregon State Bar. In 2011, 2012, 2013, 2014, and
20 2015, Ms. Murray was named a Washington "Rising Star" by SuperLawyer
21 Magazine.

22 15. Amanda M. Steiner is a member of TMLG with twenty years of
23 experience in class action and complex civil litigation. A 1997 graduate of UC
24 Berkeley School of Law who is admitted in Washington, California, New York
25 and Hawaii, she has authored briefs that have resulted in numerous favorable
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1 decisions for plaintiffs in high-profile and complex securities, employment,
2 consumer and civil rights class action in federal and state courts throughout the
3 United States. Ms. Steiner was selected for inclusion in the annual Northern
4 California “Super Lawyers” list (2012-2017) and was named to the Top 50 Women
5 Lawyers of Northern California. She is a member of the Legal Writing Institute
6 and the American Bar Association’s Appellate Practice Committee and is a Fellow
7 of the American Bar Foundation.

8 16. Adrienne D. McEntee has been a member of TMLG since September
9 2014. Ms. McEntee graduated from the University of Washington School of Law
10 in 2003, where she was a member of the Pacific Rim Law and Policy Journal and
11 Moot Court Honor Board. Prior to joining TMLG, Ms. McEntee was a member of
12 Tousley Brain Stephens PLLC, where she practiced for five years. Before entering
13 private practice, Ms. McEntee worked with the King County Prosecuting
14 Attorney’s Office, where she prosecuted a broad range of crimes. Ms. McEntee has
15 tried approximately fifty cases and has briefed, argued, and won cases before the
16 Washington State Court of Appeals. Since her admission to the bar, Ms. McEntee
17 has been an active member of the Washington State Bar Association and
18 Washington Women Lawyers, as a member of the Judicial Evaluation Committee.
19 Ms. McEntee was named to the Washington Super Lawyers list in 2018 and 2019.

20 17. Elizabeth Adams. Ms. Adams is a graduate of UCLA School of Law,
21 where she graduated Order of the Coif and served as a Comments Editor on the
22 UCLA Law Review. Ms. Adams has been practicing with Terrell Marshall since
23 2015 and has concentrated her practice during that time on complex civil litigation
24 and class actions, including wage and hour, civil rights, and consumer protection
25 cases. Prior to coming to Terrell Marshall, Ms. Adams served as a law clerk to the
26

1 Honorable Dean D. Pregerson, the Honorable George Wu, and the Honorable John
2 A. Kronstadt, all of the United States District Court for the Central District of
3 California.

4 18. Two TMLG paralegals, Jennifer Boschen and Jodi Nuss, performed
5 substantial services in connection with processing and organizing the voluminous
6 production in this case.

7 19. Other TMLG staff members provided valuable tasks, which ranged
8 from filing to docketing, but we have not included their time as part of the fee
9 petition.

10 20. I was the attorney primarily responsible for reviewing the work of the
11 TMLG timekeepers who worked on this matter. I supervised all work to
12 encourage efficiency and ensure there was as little duplication of effort as possible,
13 including limiting the number of attorneys assigned to this case.

14 **IV. OVERVIEW OF TMLG'S EFFORTS IN THIS ACTION**

15 **A. TMLG's Billing Rates**

16 21. Class Counsel have received no payment for their fees and costs.
17 Class Counsel request 25% of the settlement fund to compensate them for the work
18 performed in the case and the risk they undertook in representing Plaintiffs and
19 class members on a contingent basis.

20 22. The regular practice at TMLG is for all attorneys and staff to keep
21 contemporaneous time records, maintained on a daily basis, and describing tasks
22 performed in 0.1 hour increments. Firm policy requires all attorneys and staff to
23 enter their time into an electronic timekeeping system on a daily basis.

24 23. The following table identifies the attorneys and staff members from
25 TMLG who worked on this case and for whom the recovery of fees is sought. For
26

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each of the timekeepers below, I have stated the current hourly rate, the number of hours billed after the reductions discussed below, and the total amount of fees.

	RATE	HOURS	TOTAL
Beth E. Terrell Partner	\$750	5.2	\$3,900.00
Jennifer Rust Murray Partner	\$700	16.7	\$11,690.00
Amanda M. Steiner Partner	\$725	28.8	\$20,880.00
Adrienne D. McEntee Partner	\$650	372.5	\$242,125.00
Elizabeth Adams Senior Associate	\$425	14	\$5,950.00
Jennifer Boschen Paralegal	\$295	66.3	\$19,558.50
Jodi Nuss Paralegal	\$295	66.9	\$19,735.00
TOTAL		570.4	\$323,838.50

24. TMLG sets its rates for attorneys and paralegals based on a variety of factors, including among others: the experience, skill, and sophistication required for the types of legal services typically performed; the rates customarily charged in similar matters; and the experience, reputation, and ability of the attorneys and staff members.

25. Our lodestar calculations are based on reasonable hourly rates. Indeed, courts have routinely approved fee requests by TMLG that were based on these rates (or similar rates in place at the time of application). A sample of cases, since

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1 2010, in which federal courts have awarded fees based on TMLG’s billing rates,
2 and/or reimbursed costs as reasonable, are:

3 a. September 2019, in *Borecki v. Raymours Furniture Company,*
4 *Inc.*, 1:17-cv-01188-LAK-SN (S.D.N.Y.);

5 b. August 2019, in *Abante Rooter and Plumbing, Inc. v.*
6 *Alarm.com, Inc.*, 4:15-cv-06314-YGR (N.D. Cal.);

7 c. December 2017, in *In re: Honest Marketing Litigation*, 1:16-
8 cv-01125-VM (S.D.N.Y.);

9 d. May 2016, in *Lushe v. Verengo, Inc.*, CV13-07632-AB (PJWx)
10 (C.D. Cal.);

11 e. April 2016, in *Rinky Dink, Inc., et al. v. Electronic Merchant*
12 *Systems, Inc.*, 2:13-cv-01347-JCC (W.D. Wash.);

13 f. September 2014, in *Chesbro v. Best Buy Stores, L.P.*, C10-774
14 RAJ (W.D. Wash.);

15 g. August 2014, in *Rose v. Bank of America Corp.*, Case No.:
16 5:11-CV-02390-EJD; 5:12-CV-04009-EJD (N.D. Cal.);

17 h. March 2013, in *Meilleur v. AT&T Corp.*, C11-01025 MJP
18 (W.D. Wash.);

19 i. October 2012, in *Khadera v. ABM Industries, Inc.*, C08-0417
20 RSM (W.D. Wash.);

21 j. September 2012, in *Arthur v. Sallie Mae, Inc.*, C10-00198 JLR
22 (W.D. Wash.);

23 k. January 2012, in *Milligan v. Toyota Motor Sales, U.S.A., Inc.*,
24 C09-05418 RS (N.D. Cal.);

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1 1. August 2011, in *Seraphin v. AT&T Internet Svcs.*, CV-00131-
2 REB (D. Idaho); and

3 m. December 2010, in *Carideo v. Dell Inc.*, No. CV-01772-JLR
4 (W.D. Wash.).

5 26. The lodestar does not include the work we will do after completion of
6 this motion, which will include working with the settlement administrator.

7 **B. TMLG’s Litigation Costs**

8 27. TMLG has incurred \$12,051.21 in expenses, which include
9 deposition/transcript fees, mediation fees, travel costs associated with the
10 depositions and mediation, filing fees, PACER costs, messenger, process server
11 charges, copying, legal research, and postage.

CATEGORY OF EXPENSE	TOTAL
Airfare	\$1,458.99
Hotel	\$374.49
Meals while traveling	\$122.74
Mediation	\$1,099.12
Filing fees	\$800.00
Taxi and parking costs	\$169.52
Transcripts	\$6,598.66
Westlaw charges	\$41.07
PACER	\$33.50
Process server/courier fees	\$1,037.00
Copying costs	\$315.20
Postage	\$.92
TOTAL:	\$12,051.21

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2 **V. THE NAMED PLAINTIFFS PARTICIPATED IN THE LITIGATION**

3 28. Both Plaintiffs protected the interests of the Settlement Class for more
4 than three years. Each actively assisted in the prosecution of this case by searching
5 and preserving personal records, responding to two sets of Defendants' discovery
6 requests, and providing declarations. Mr. Ahmed and Mr. Monteleone each sat for
7 a full-day deposition. In all, Mr. Ahmed and Mr. Monteleone estimate they have
8 spent at least 80 and 30 hours, respectively, in connection with the lawsuit.

9 **VI. STATUS OF CLAIMS ADMINISTRATION**

10 29. As of September 25, 2019, Claims Administrator, JND, has received
11 requests for exclusion from six Settlement Class Members. There have been no
12 objections. JND has received a total of 14,632 Claim Forms to date, of which
13 13,269 are approved and 1,363 which are unsigned, duplicative, or are still being
14 processed in order to match them to Settlement Class Member records. JND has
15 advised that they will continue to review and report on claims as received through
16 the claim filing deadline.

17
18 I declare under penalty of perjury under the laws of the state of California
19 and the United States of America that the foregoing is true and correct.

20 EXECUTED at Seattle, Washington, this 26th day of September, 2019.

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23 /s/ Beth E. Terrell, SBN #178181
24 Beth E. Terrell, SBN #178181

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1 CERTIFICATE OF SERVICE

2 I, Adrienne D. McEntee, hereby certify that on September 26, 2019, I
3 electronically filed the foregoing with the Clerk of the Court using the CM/ECF
4 system which will send notification of such filing to the following:

5
6 Matthew A. Morr, *Admitted Pro Hac Vice*
7 Email: morrm@ballardspahr.com
8 BALLARD SPAHR LLP
9 1225 17th Street, Suite 2300
10 Denver, Colorado 80202
11 Telephone: (303) -292-2400
12 Facsimile: (303) 296-3956

13
14 Julia B. Strickland, SBN #83013
15 Email: jstrickland@stroock.com
16 Shannon E. Dudic, SBN #261135
17 Email: sdudic@stroock.com
18 Arjun P. Rao, SBN #265347
19 Email: arao@stroock.com
20 STROOCK STROOCK & LAVAN LLP
21 2029 Century Park East
22 Los Angeles, California 90067
23 Telephone: (310) 556-5800
24 Facsimile: (310) 556-5959

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26 *Attorneys for Defendants HSBC Bank USA, National Association and
27 PHH Mortgage Corporation*

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DECLARATION OF BETH E. TERRELL IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS
AND FOR INCENTIVE AWARDS TO THE CLASS
REPRESENTATIVES - 16
CASE No. 5:15-CV-2057-FMO-SP

1 DATED this 26th day of September, 2019.

2 TERRELL MARSHALL LAW GROUP PLLC

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27 *Attorneys for Plaintiffs*

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