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12 *Attorneys for Plaintiffs*

13 UNITED STATES DISTRICT COURT
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

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

18 Plaintiffs,

19 v.

20 HSBC BANK USA, NATIONAL
21 ASSOCIATION, and PHH
22 MORTGAGE CORPORATION,

23 Defendants.

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

**DECLARATION OF TODD M.
FRIEDMAN 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
Courtroom, 6th Fl.,
Courtroom 6D

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DECLARATION OF TODD M. FRIEDMAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS
AND FOR INCENTIVE AWARDS TO THE CLASS
REPRESENTATIVES - 1
CASE No. 5:15-cv-2057-FMO-SP

1 I, Todd M. Friedman, declare as follows:

2 1. I am the name Partner of the Law Offices of Todd M. Friedman P.C.
3 (“LOTF”), counsel of record for Plaintiffs in this matter. I am an attorney licensed
4 to practice law in the State of California since 2001, the State of Illinois since
5 2002, and the State of Pennsylvania since 2011. I have been continuously licensed
6 in California since 2001, Illinois since 2002, and Pennsylvania since 2011, and am
7 in good standing with the California State Bar, Illinois State Bar, and Pennsylvania
8 State Bar. I have litigated cases in both state and federal courts in California and
9 Illinois. I am also admitted in every Federal district in California and have handled
10 federal litigation in the federal districts of California. I am admitted to practice
11 before this Court pro hac vice. I respectfully submit this declaration in support of
12 Plaintiffs’ Motion for Attorneys’ Fees and Costs and for Service Awards to the
13 Class Representatives. Except as otherwise noted, I have personal knowledge of
14 the facts set forth in this declaration and could testify competently to them if called
15 upon to do so.

16 **I. CASE BACKGROUND**

17 2. Plaintiff Saber Ahmed and the LOTF originally filed this matter on
18 October 6, 2015 [Dkt. 1] to bring claims for violations of the Telephone Consumer
19 Protection Act (“TCPA”), 47 U.S.C. § 227, *et seq.* against Defendant HSBC. The
20 matter was stayed shortly thereafter in December 2015 pending decisions in two
21 appellate cases. The matter was then unstayed and consolidated with the
22 *Monteleone* matter on March 13, 2017 [Dkt. 24].

23 3. LOTF has invested numerous hours and advanced significant costs
24 into the investigation and prosecution of this case. For the sake of brevity, I will
25 reference the description of the extensive discovery and motion practice laid forth
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1 in Ms. Terrell's declaration contemporaneously filed, and only add that my office
2 was involved in all stages of litigation, taking lead on certain tasks and providing at
3 a bare minimum a review of all other tasks in this litigation. As the counsel
4 present within this district and thus the counsel most easily able to appear for
5 hearings and meetings, the LOTF was involved in numerous hearings and meet and
6 confers, as well as an in-person document review for sensitive materials that
7 Defendants refused to produce in full electronically.

8 **II. FIRM BACKGROUND AND EXPERIENCE**

9 4. My firm, The Law Offices of Todd M. Friedman, P.C., in which I am
10 a principal, has litigated over 1000 individual based consumer cases and litigated
11 over 100 consumer class actions. These class actions were litigated in Federal and
12 State Courts throughout the country. Approximately 100% percent of my practice
13 concerns consumer litigation in general, with approximately 90% of my class
14 action experience involving consumer protection.

15 5. My firm has numerously been approved by courts as adequate class
16 counsel, and is highly experienced in litigating Consumer class actions.

17 6. I have served as plaintiff's counsel in at least the following cases
18 involving various consumer rights claims (including class actions claims):

- 19 a. *Vacarro v. I.C. Systems, Inc.*, 12-CV-02371-JAH-NLS (S.D. Cal.);
- 20 b. *Rivera v. Nuvel Credit Company LLC*, 13-CV-00164-TJH-OP (E.D. Cal);
- 21 c. *Dancer v. L.A. Times*, BC472154 (L.A. Superior Court);
- 22 d. *Couser v. Comenity Bank*, 3:12-cv-02484-MMA-BGS (S.D. Cal.);
- 23 e. *Stemple v. QC Financial Services Group of California, Inc.*, 3:12-
24 cv01997-CAB-WVG (S.D. Cal.);
- 25 f. *Abdejalil v. GE Capital Retail Bank*, 3:12-cv-02078-IEG-RBB (S.D. Cal.);

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CASE NO. 5:15-CV-2057-FMO-SP

- 1 g. *Groina v. Doc Prep Solutions*, 3:12-cv-02578-BTM-BGS (S.D. Cal.);
2 h. *Alexander v. Manasseh Jordan Ministries*, 3:12-cv-02584-IEG-BLM
3 (S.D. Cal.);
4 i. *Neuls v. Dish Network*, 1:13-cv-01181-WJM-KMT (D. CO.);
5 j. *Lecesse v. My Financial Gateway*, 3:12-cv-02375-JLS-KSC (S.D. Cal.);
6 k. *Auerbach v. Successful Education Online, LLC*, 3:12-cv-05248-JSC (N.D.
7 Cal.);
8 l. *Raffin v. E-Choice Healthcare LLC*, 3:12-cv-02517-LAB-BLM (S.D.
9 Cal.);
10 m. *Olney v. Job.com*, 1:12-cv-01724-LJO-GSA (E.D. Cal.);
11 n. *Couser v. Legal Shield*, 3:12-cv-02575-LAB-WVG (S.D. Cal.);
12 o. *Langley v. Homeward Residential*, 2:12-cv-02623-JAM-EFB (E.D. Cal.);
13 p. *Hunter v. Palisades Collection*, 3:12-cv-02401-JAH-JMA (S.D. Cal.);
14 q. *Couser v. Worldwide Commerce Associates, LLC*, 3:13-cv-00118-H-BGS
15 (S.D. Cal.);
16 r. *Tarizzo v. United Agencies, Inc., Et Al.*, CV12-10248 JFW (MRWx) (C.D.
17 Cal.);
18 s. *Richard Chen v. National Enterprise Systems*, 3:12-cv-05910-JCS (N.D.
19 Cal.);
20 t. *Couser v. Apria Healthcare, Inc.* 8:13-cv-00035-JVS-RNB (C.D. Cal.);
21 u. *Willis, Et Al. v. Chase Retail Services, Et Al.*, CV12-10252 DMG (SHx)
22 (C.D. Cal.);
23 v. *French v. Target*, 0:13-cv-02626 (District of MN);
24 w. *Williams v. Credit Management, LP*, 5:12-cv-01924-TJH-OP (C.D. Cal.);
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- 1 x. *Murdock v. Western Dental Services, Inc.*, 3:12-cv-02449-GPC-BLM
2 (S.D. Cal.);
3 y. *Senesac v. Santander*, 3:12-cv-1193-J-20JRK (M.D. FL.);
4 z. *Kielbasinski v. American Publishing Co.*, 841 Civil 2012 (Somerset
5 County, PA)
6 aa. *Friedman, Et Al. v. United American Insurance Company*, 3:12-cv02837-
7 IEG-BGS (S.D. Cal.);
8 bb. *Malis v. Saveology.com, LLC*, 2:13-cv-10013-BAF-LJM (E.D. MI.);
9 cc. *Blotzer v. Vital Recovery Services, Inc.*, 3:13-cv-00119-H-JMA (S.D.
10 Cal.);
11 dd. *Friedman v. Massage Envy*, 2:13-cv-04607-JAK-FFM (C.D. Cal.);
12 ee. *Labou v. Cellco Partnership, et al*, 2:13-cv-00844-MCE-EFB (S.D.
13 Cal.);
14 ff. *Pacleb v. Career Education Corporation*, 2:13-cv-03090-R-FFM (C.D.
15 Cal.);
16 gg. *McNally v. Commonwealth Financial Systems, Inc. et al*, 3:12-cv-02770-
17 IEG-MDD (S.D. Cal.);
18 hh. *Franco v. Consumer Portfolio Services, Inc.*, 3:13-cv-01364-EDL (N.D.
19 Cal.);
20 ii. *Zimmer, Jr. v. 24 Hour Fitness, et al*, NC057484 (L.A. Superior Court);
21 jj. *Webb v. Healthcare Revenue Recovery Group, LLC*, 3:13-cv-00737-RS
22 (N.D. Cal.);
23 kk. *Couser v. Central Credit Services, Inc.*, 3:12-cv-02424-LAB-WMC
24 (S.D. Cal.);
25
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1 ll. *Abdeljalil v. General Electric Capital Corporation*, 12-CV-02078-
2 IEGRBB (S.D. Cal.);
3 mm. *Rivera v. Nuwell Credit Company et al*, 5:13-cv-00164-TJH-OP (C.D.
4 Cal.);
5 nn. *Blotzer v. Dura Medic, LLC*, 2:13-cv-00675-JAK-JCG (C.D. Cal.);
6 oo. *Foote v. Credit One Bank*, 2:13-cv-00512-MWF-PLA (C.D. Cal.);
7 pp. *Rodriguez v. Real Time Resolutions*, 3:13-cv-00728-JM-RBB (S.D.
8 Cal.);
9 qq. *Fox v. Asset Acceptance*, 3:13-CV-00922-DMS-BGS (S.D. Cal.);
10 rr. *Couser v. Financial Recovery Services, Inc.*, 3:12-cv-02541-CAB-WVG
11 (S.D. Cal.);
12 ss. *Friedman v. LAC Basketball Club, Inc.*, 2:13-cv-00818-CBM-AN (C.D.
13 Cal.);
14 tt. *Chen v. Allstate Insurance Company, et al*, 3:13-CV-00685-LB (N.D.
15 Cal.);
16 uu. *Eubank v Terminix International*, 3:15-cv-00145-WQH-JMA (S.D.
17 Cal.);
18 vv. *Rowe v Michaels Stores* 15-cv-01592-EJD (N.D. Cal.);
19 ww. *Hernandez v Chevron* 56-2015-00465135-CU-NP-VTA (Ventura
20 County SC);
21 xx. *Benotmane v Midway Rent a Car* BC560969 (LASC);
22 yy. *Payton v Luxe Valet* BC588462 (LASC); and
23 zz. *Kellet, et. al v Uber Technologies*, BC585704 (LASC).

24 7. Over the past four years, The Law Offices of Todd M. Friedman has
25 served as plaintiff's counsel in at least the following class action cases involving
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1 various class actions claims consumer rights claims, where a settlement was
2 reached on a class-wide basis, and have achieved over \$95,000,000 in classwide
3 relief for consumers:

4 a. *Dancer v. L.A. Times*, BC472154 (L.A. Superior Court) (common fund
5 class-wide settlement of \$3 million to \$4 million granted final
6 approval);

7 b. *Couser v. Comenity Bank*, 3:12-cv-02484-MMA-BGS (S.D. Cal.)
8 (\$8.475 million class-wide settlement achieved and granted final
9 approval);

10 c. *Stemple v. QC Financial Services Group of California, Inc.*, 3:12-cv-
11 01997-CAB-WVG (S.D. Cal.) (certified class achieved by motion, and
12 subsequent class-wide settlement of \$1.5 million achieved, with final
13 approval granted);

14 d. *Couser v. Apria Healthcare, Inc.* 8:13-cv-00035-JVS-RNB (C.D. Cal.)
15 (common fund class-wide settlement of \$400,000 to \$750,000, granted
16 final approval);

17 e. *Abdeljalil v. General Electric Capital Corporation*, 12-CV-02078-
18 IEG-RBB (S.D. Cal.) (class-wide settlement with common fund of
19 \$6.125 million achieved, preliminary approval granted, final approval
20 pending);

21 f. *Fox v. Asset Acceptance*, 3:13-CV-00922-DMS-BGS (S.D. Cal.)
22 (common fund of \$1 million in class-wide relief achieved, granted final
23 approval);

24 g. *Friedman v. LAC Basketball Club, Inc.*, 2:13-cv-00818-CBM-AN
25 (C.D. Cal.) (class-wide settlement achieved and granted final
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1 approval);

2 h. *Gerich et. al. v. Chase Bank USA et. al.* Case No 1:12-cv-5510 (N.D.
3 Ill.) (class-wide settlement of \$34 million, granted final approval);

4 i. *Than Zaw v Nelnet, Inc.*, Penal Code § 632 class – (Achieved classwide
5 settlement of \$1,188,110, granted final approval of court);

6 j. *Medeiros v HSBC*, (common fund settlement of between \$4.5 million
7 and \$6.5 million achieved, preliminary approval granted);

8 k. *Ann Fox v. Spectrum Club Holding Company et al.*, Case No. 2:14-CV-
9 06766-PSG-FFMx (class-wide settlement, preliminary approval
10 granted);

11 l. *Sayan Aboudi v. T-Mobile USA, Inc.*, Case No. 3:12-cv-02169-BTMNLS
12 (class-wide settlement in TCPA case, with common fund of \$2.5 million to
13 \$5 million, with average per class member payment of \$500,
14 final approval granted);

15 m. *Andrew Roseman v. BGASC, LLC, et. al.*, Case No. EDCV 15-1100-
16 VAP (SPx) (C.D. Cal.) (class-wide relief achieved, final approval
17 granted);

18 n. *Everado Gonzalez v The Scotts Company*, Case No. BC577875,
19 Consolidated with Case No: BC570350 (LASC) (class-wide settlement
20 of \$925,000 in wage and hour class action on behalf of approximately
21 603 employees achieved, final approval granted);

22 o. *Payton v Luxe Valet*, Case No. BC588462 (LASC) (class-wide
23 settlement in wage and hour independent contractor misclassification
24 class action, on behalf of 1,800 employees, settled for \$2.4 million,
25 final approval granted);

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CASE No. 5:15-cv-2057-FMO-SP

1 p. *Shelby v Two Jinn, Inc.*, Case No. 2:15-cv-03794-AB-GJS (C.D. Cal.)
2 (EFTA class action involving no cognizable actual damages, with net
3 worth of company of \$25 million, settled for non-reversionary common
4 fund of \$457,000, despite liability under 15 U.S. Code § 1693m(a)
5 likely being only \$250,000; final approval granted, zero objections);
6 q. *Couser v Dish One Satellite*, Case No. 5:15-cv-02218-CBM-DTB
7 (C.D. Cal.) (TCPA class action, final approval granted);
8 r. *Couser v Dish One Satellite*, Case No. RIC 1603185 (Riverside S.C.)
9 (Penal Code 632 class action, preliminary approval pending);
10 s. *De La Paz v Accurate Courier NCA LLC*, Case No. 16CV00555 (Santa
11 Cruz County Superior Court) (PAGA and Labor Code class action,
12 final approval granted);
13 t. *Anne Wolf v Hewlett Packard Company*, Case No. 5:15-cv-01221-
14 BRO-GJS (C.D. Cal.) (CLRA class action certified by contested motion
15 on behalf of tens of thousands of class members who purchased printer
16 that was falsely advertised to include Smart Install feature, settled on a
17 wider multi-state, multi-product basis, preliminary approval granted);
18 u. *Ross v Zurixx LLC*, Case No. 34-2016-00190874 (Sacramento SC)
19 (UCL, FAL and CLRA class action alleging false advertising for real
20 estate educational courses, non-reversionary common fund settlement
21 for over \$600 per class member, final approval granted);
22 v. *Eubanks v Terminix International, Inc.*, Case No. 3:15-cv-00145-
23 WQH-JMA (PAGA settlement reached in wage and hour action on
24 behalf of pest control technicians, preliminary approval pending);
25 w. *Jonathan Weisberg, v. HD Supply, Inc.*, Case No. 15-cv-08248-FMO
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1 (MRWx) (class-wide settlement in TCPA class action, settled for
2 \$1.225 million, final approval granted);

3 x. *Miler v Pacific Auto Wash Partners*, Case No. 30-2015-00813013-
4 CU-OE-CXC (wage and hour class action, preliminary approval
5 granted final approval pending);

6 y. *Sonia Barrientos v Law Office of Jeffrey H. Jordan*, Case No. 2:15-cv-
7 06282-JAK-GJS (FDCPA/RFDCPA letter class action, settled on class
8 wide basis, preliminary approval granted);

9 z. *Tahmasian v Midway Rent A Car*, Case No. 30-2015-00813013-CUOE-
10 CXC (LASC) (PAGA and Labor Code class action, final approval
11 granted);

12 aa. *Craig Cunningham v Lexington Law Firm*, Case No. 1:17-cv-00087-
13 EJF (N.D. UT) (TCPA class action MDL involving solicitation
14 prerecorded voice calls made by a third party, vicarious liability
15 alleged, preliminary approval pending).

16 bb. *Sheena Raffin v Medcredit, Inc. et. al.*, Case No. 2:15-cv-04912-
17 MWFPJW (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified by
18 Hon. George H. King Ret. under Rule 23(b)(2) and (b)(3) by contested
19 motion on behalf of 11,000 class members whose calls were recorded
20 without knowledge or consent, settled for \$5 million, preliminary
21 approval granted);

22 cc. *Fernandez v Reliance Home Services, Inc.* Case No. BC607572 *Los*
23 *Angeles Superior Court* (wage and hour plus PAGA class action, Final
24 approval granted);

25 dd. *Jaylinda Girardot et al v. Bail Hotline Bail Bonds, Inc.*, Case No.
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1 FCS048335 Solano County Superior Court (wage and hour plus PAGA
2 class action, preliminary approval pending);

3 ee. *Silva v. Olson and Co. Steel*, Case No. 17CV001045 (Napa County
4 Superior Court) (wage and hour class action on behalf of over 500 class
5 members; preliminary approval pending);

6 ff. *Ryoo Dental, Inc. v OCO Biomedical, Inc.*, Case No. 8:16-cv-01626-
7 DOC-KES (TCPA fax blast class action, settled on class wide basis,
8 final approval granted);

9 gg. *Aliav v Sunset Eats, LLC*, Case No. BC655401 Los Angeles Superior
10 Court (false advertising class action on behalf of approximately 10,000
11 class members, settled on class wide basis; preliminary approval
12 pending); and

13 hh. *Richards v CoreCivic of Tennessee, LLC*, Case No. 1:17-cv-01094-
14 LJO-JLT (E.D. Cal.) (wage and hour class action settled for
15 approximately \$3 million, preliminary approval pending)

16 **II. Overview of LOTF's Efforts In This Action**

17 **A. LOTF's Lodestar**

18 8. Law Offices of Todd M. Friedman, P.C. has maintained
19 contemporaneous time records since the commencement of this action. To date, I
20 have incurred 54.8 hours of attorney time for this case. Specifically, I have
21 incurred approximately 1.6 hours working on the pleadings and investigation;
22 approximately 1 hour in preparing for hearings; approximately 3.2 hours in
23 communications with opposing counsel and the Court; approximately 12.2 hours
24 on motion practice and document review; approximately 2.2 hours on travel for
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1 mediation; approximately 8.2 hours to prepare for and attend mediation;
2 approximately 1.8 hours on discovery; approximately 12.4 hours communicating
3 with co-counsel; and approximately 12.2 hours on administrative tasks, including
4 communications with the settlement administrator and assisting responses to
5 settlement class members inquiries.

6 9. My billing rate is \$675 per hour. The hourly rates sought herein for
7 myself have been approved by numerous courts, including in the following cases:
8 *Payton v Luxe Valet*, Case No. BC588462 (LASC); *Shelby v Two Jinn, Inc.*, Case
9 No. 2:15-cv-03794-AB-GJS (C.D. Cal.); *Couser v Dish One Satellite*, Case No.
10 5:15-cv-02218-CBM-DTB (C.D. Cal.); *De La Paz v Accurate Courier NCA LLC*;
11 *Ross v Zurixx LLC*, Case No. 34-2016-00190874 (Sacramento SC); *Jonathan*
12 *Weisberg, v. HD Supply, Inc.*, Case No. 15-cv-08248-FMO (MRWx); *Tahmasian v*
13 *Midway Rent A Car*, Case No. 30-2015-00813013-CU-OECXC (LASC);
14 *Fernandez v Reliance Home Services, Inc.* Case No. BC607572 Los Angeles
15 Superior Court; *Ryoo Dental, Inc. v OCO Biomedical, Inc.*, Case No. 8:16-cv-
16 01626-DOC-KES.

17 10. Regarding my rate, I have been practicing law since 2001, and am the
18 managing partner of one of the most active consumer protection law firms in
19 California. I have been counsel of record on hundreds of class action lawsuits,
20 dozens of which have resolved on a class-wide basis. In the past four years alone,
21 my firm has been counsel on cases totaling over \$95 million in class-wide relief for
22 consumers.

23 11. To date, Mr. Thomas Edward Wheeler, an attorney and senior
24 associate in my office has incurred 260.9 hours of attorney time for this case.
25 Specifically, he has incurred approximately 20.4 hours in communications with
26

1 opposing counsel and the Court; approximately 82.2 hours on motion practice,
2 including drafting the initial Settlement Agreement, and document review;
3 approximately 3.6 hours on travel for mediation; approximately 8 hours to prepare
4 for and attend mediation; approximately 102.1 hours on discovery; approximately
5 20.4 hours communicating with co-counsel; and approximately 24.2 hours on
6 administrative tasks, including documenting and coordinating the various litigation
7 tasks undertaken in this case. I reviewed his contemporaneous time records and
8 spoke with Mr. Wheeler with respect to his hours worked on this matter.

9 12. Mr. Wheeler is a graduate of U. Penn Law and a senior associate at
10 my firm and has been a practicing attorney since early 2016. He has worked
11 extensively on consumer protection matters, including class actions, during his
12 three-and-a-half years with my firm and has been heavily involved in multiple
13 certified and settled Class Actions. His work includes assisting on the *Caldera v.*
14 *American Medical Collection Association*, (C.D. Cal.) Case No. 2:16-cv-00381-
15 CBM-AJW matter, a certified TCPA class action. Additionally, he has been
16 previously approved by this Court at the rate of \$350 hour in 2018 in the *Weisberg*
17 *v. HD Supply, Inc.*, (C.D. Cal.) Case No. 2:15-cv-08248-FMO-MRW matter. In
18 light of his increasing experience, an hourly rate of \$455 is warranted, and is
19 further warranted in light of customary rates for associates of his level on the
20 Laffey Matrix.

21 13. In summary, with regard to a bare bones lodestar amount, our current
22 billing records reflect approximately 54.8 hours of time for myself and 260.9 hours
23 for Mr. Wheeler. My hourly billing rate is \$675 per hour. The hourly rate of
24 Thomas E. Wheeler is \$455 per hour. Other members of my firm, including
25 paralegals and law clerks contributed to the work on this matter, but their hours
26

1 have not been included, for the purpose of presenting a reasonable and
2 conservative figure for the Court. Based on these rates, and the accompanying time
3 entries for each corresponding individual, the lodestar estimate for this case for the
4 LOTF is \$155,699.50.

5 14. 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 15. Based on the foregoing, when combined with our co-counsel's
8 lodestars, I submit that our request for an award of 25% of the Common Fund is
9 reasonable.

10 **B. LOTF Litigation Costs**

11 16. LOTF has incurred approximately \$8,100, which include mediation
12 fees, travel costs associated with the mediation and appearances, filing fees,
13 messenger, and process server charges, for which my firm seeks reimbursement.
14

| CATEGORY OF EXPENSE | TOTAL |
|-----------------------------|-------------------|
| Mileage | \$436.00 |
| Mediation Fees | \$6,251.56 |
| Filing Fees | \$450.00 |
| Parking Costs | \$325.00 |
| Process server/courier fees | \$637.00 |
| TOTAL: | \$8,099.56 |

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

3 EXECUTED at Woodland Hills, California, this 26th day of September,
4 2019.

5
6
7 /s/ Todd M. Friedman
8 Todd M. Friedman

CERTIFICATE OF SERVICE

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

Marcos D. Sasso, SBN #285335
Email: sassom@ballardspahr.com
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DECLARATION OF TODD M. FRIEDMAN 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.

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