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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

<p>SABER AMHED and JOHN MONTELEONE, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>HSBC BANK USA, N.A. et. al.,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No.: 5:15-cv-02057-FMO-SP</p> <p>DECLARATION OF ABBAS KAZEROUNIAN IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS AND SERVICE AWARDS</p> <p>JUDGE: Fernando M. Olguin</p>
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DECLARATION OF ABBAS KAZEROUNIAN

I, ABBAS KAZEROUNIAN, declare:

1. I am one of the attorneys for plaintiffs SABER AHMED and JOHN MONTELEONE (the “Plaintiffs”) in the above-captioned action against defendants HSBC BANK USA, N.A. (“HSBC”) and PHH MORTGAGE CORPORATION (“PHH,” together the “Defendants”).
2. I am over the age of 18 and am fully competent to make this declaration.
3. I was admitted to the State Bar of California in 2007 and have been a member in good standing ever since that time. I have litigated cases in both state and federal courts in California, Washington, Nevada, Arizona, Arkansas, New York, New Jersey, Tennessee, Ohio, Florida, Illinois, Colorado and Texas. I am admitted in every federal district in California and have handled federal litigation in the federal districts of California. I am also admitted to the state bars of Texas, Illinois, New York, Colorado, Washington, Michigan, District of Columbia, the Ninth Circuit Court of Appeals, the Eighth Circuit Court of Appeals, and the Supreme Court of the United States.
4. If called as a witness, I would competently testify to the matters herein from personal knowledge. The declaration is based upon my personal knowledge, except where expressly noted otherwise.
5. I submit this declaration in support of Plaintiffs’ Motion for Attorneys’ Fees, Costs and Service Awards.
6. I have been appointed as one of Class Counsel in this action.
7. I participated in person at the first private mediation before the Honorable Hay C. Gandhi (Ret.) of JAMS on April 20, 2018.
8. Before the mediations, the parties exchanged numerous rounds of written discovery requests; reviewed thousands of pages of documentation

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1 (Defendants produced over 80,000 pages of documentation; my office
2 reviewed over 5,000 pages of documentation produced by Defendants);
3 conducted depositions on both sides (both Plaintiffs were deposed; and on
4 the Defendants' side, Plaintiffs' attorneys took the depositions of Michael
5 Sgammato of PHH; and Katie Black of HSBC); conducted third-party
6 discovery (deposition of representative for LiveVox, Kevin Stark; served
7 subpoena on Black Knight Financial Services, Inc.); and conducted
8 confirmatory written discovery post-mediation.

9 9. Plaintiffs' Counsel in this case worked on solely a contingency basis,
10 despite knowing that there was a risk that Counsel may not succeed.

11 **HOURS INCURRED AND LITIGATION COSTS**

12 10. As of August 30, 2019, I have incurred approximately 32.6 hours in
13 litigation this action. Specifically, I incurred approximately 4 hours on
14 communications with opposition counsel; Approximately 1.3 hours on
15 document review and motion practice; approximately 20.7 hours preparing
16 for and attending mediation; approximately 0.4 hours on discovery; and
17 approximately 6.2 hours communicating with co-counsel. All of these hours
18 were logged contemporaneously in the normal course of business.

19 11. I anticipate incurring approximately at least 12 additional hours through the
20 final approval hearing, for a total of 46.4 hours in this action.

21 12. Additionally, an associate attorney at my office, Veronica Cruz, incurred
22 approximately 5.5 hours on review of discovery documentation produced
23 by Defendants.

24 13. Based on my extensive experience litigating consumer class actions as
25 detailed below, I believe my proposed hourly rate of \$715 is fair and
26 reasonable.

27 14. I was approved for an hourly rate \$705 in *Ronquillo-Griffin v. TransUnion*
28 *Rental Screening Sols., Inc.*, No. 17cv129 JM (BLM), 2019 U.S. Dist.

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1 LEXIS 79021, at *27 (S.D.Cal. May 9, 2019), *Guiette v. U.S. Bank National*
2 *Association*, No. 1:18-cv-00174-TSB (S.D. Ohio Aug. 8, 2019), and *Maur v.*
3 *Results Transformation Center*, No. CVCV-2018-831-1 (Yolo Sup. Ct.,
4 Aug. 2019).

5 15. On June 27, 2018, I was admitted to the state bar of New York.

6 16. My firm is not seeking an award of fees for work performed by paralegals
7 at Kazerouni Law Group, APC, which hours have been zeroed.

8 17. To date, my firm, Kazerouni Law Group, APC, has incurred \$7,750.21 in
9 litigation costs. Some of the larger expenses include \$6,251.56 for JAMS
10 mediation fees; \$650 to file two *pro hac vice* applications for co-counsel;
11 \$504.80 for flights to mediations; \$367.41 for a hotel in connection with
12 mediation; and \$114.25 for delivery of chambers copy of the Motion for
13 Preliminary Approval of Class Action Settlement. See **Exhibit A** hereto.

14 18. My firm will likely incur additional costs in connection with filing the
15 motion for final approval and attending the fairness hearing.

16 19. I believe the costs incurred in this matter are necessary and reasonable.

17 **CLASS COUNSEL'S EXPERIENCE**

18 20. Since my admission to the State Bar of California in 2007, I have been
19 engaged exclusively in the area of consumer rights litigation, primarily in
20 the area of fair debt collections, the defense of debt collection lawsuits, class
21 action litigation under the Telephone Consumer Protection Act, California's
22 Invasion of Privacy Statute, false advertising actions concerning consumer
23 products, unfair competition and other consumer statutes.

24 21. My firm, Kazerouni Law Group, APC, in which I am a principal, has
25 litigated over 5,000 cases in the past eleven years. My firm has six offices
26 in Orange County, California; San Luis Obispo, California; Phoenix,
27 Arizona; Las Vegas, Nevada; St. George, Utah; and Dallas, Texas.
28 Kazerouni Law Group, APC has extensive experience in consumer class

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1 actions and other complex litigation. My firm has a history of aggressive,
2 successful prosecution of consumer class actions. Approximately 95%
3 percent of my practice concerns consumer litigation in general.

4 **KAZEROUNI LAW GROUP, APC'S**

5 **CONSUMER RELATED EXPERIENCE AND RESULTS**

6 22.I argued before the Ninth Circuit Court of Appeals in the case of *Knutson v.*
7 *Sirius XM Radio*, No. 12-56120 (9th Cir. 2014), which resulted in an order
8 in favor of my client.

9 23.On December 6, 2016, I argued before the Ninth Circuit Court of Appeals
10 in the case of *Marks v. Crunch San Diego, LLC*, which resulted in an order
11 in favor of my client's TCPA claim. *See Marks v. Crunch San Diego, LLC*,
12 2018 U.S. App. LEXIS 26883 (9th Cir. 2018).

13 24.In April of 2017, argued before the Ninth Circuit Court of Appeals in the
14 case of *Afewerki v. Anaya Law Grp.*, 868 F.3d 771 (9th Cir. 2017). This
15 resulted in an order in favor of my client. Further, on May 15, 2019, I again
16 argued before the Ninth Circuit Court of Appeals in the case of *Afewerki v.*
17 *Anaya Law Group, et al.*, No. 18-55100, resulting in an order favorable to
18 my client.

19 25.A brief summary of a non-inclusive list of notable published decisions are as
20 follows:

- 21 a. *Marks v. Crunch San Diego, LLC*, 2018 U.S. App. LEXIS 26883 (9th
22 Cir. 2018) (TCPA class action where Ninth Circuit upheld Ninth Circuit
23 precedence on the definition of an Automatic Telephone Dialing
24 System);
- 25 b. *Sherman v. Yahoo!, Inc.*, 2014 U.S. Dist. LEXIS 13286; 13-CV-0041-
26 GPC-WVG (S.D. Cal.) (TCPA class action where Defendant's motion
27 for summary judgment was denied holding that a single call or text
28 message with the use of an ATDS may be actionable under the TCPA);

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- 1 c. *Olney v. Progressive Casualty Insurance Company*, 13-CV-2058-GPC-
2 NLS, 2014 U.S. Dist. LEXIS 9146 (S.D. Cal.) (Defendant’s motion to
3 dismiss or in the alternative to strike the class allegations was denied
4 finding that debt collection calls were not exempt from coverage under
5 the TCPA);
- 6 d. *Iniguez v. The CBE Group, Inc.*, 2013 U.S. Dist. LEXIS 127066 (E.D.
7 Cal.); 13-CV-00843-JAM-AC (The court denied Defendant’s motion to
8 dismiss and to strike class allegations holding that the TCPA applies to
9 any call made to a cellular telephone with an ATDS);
- 10 e. *Stemple v. QC Holdings, Inc.*, No. 12-cv-01997-BAS (WVG), 2014 U.S.
11 Dist. LEXIS 125313 (S.D. Cal. Sep. 5, 2014) (order denying defendant’s
12 motion for reconsideration of class certification under the TCPA);
- 13 f. *Chen v. Allstate Ins. Co.*, 819 F.3d 1136 (9th Cir. 2016) (order affirming
14 decision finding unaccepted offer of judgment under Fed. R. Civ. P. 68
15 did not moot the plaintiff’s individual TCPA claims).

16 26.I have filed and litigated numerous consumer class actions over the last
17 several years, including but not limited to the following, which I am or have
18 been personally involved in:

- 19 a. *Lemieux v. EZ Lube, LLC, et al.*, 12-CV-01791-JLS-WYG (S.D. Cal.)
20 (Served as co-lead counsel; finally approved on December 8, 2014);
- 21 b. *Malta, et al. v. Wells Fargo Home Mortgage, et al.*, 10-CV-1290-IEG
22 (BLM) (Served as co-lead counsel for a settlement class of borrowers in
23 connection with residential or automotive loans and violations of the
24 TCPA in attempts to collect on those accounts; obtained a common
25 settlement fund in the amount of \$17,100,000; final approval granted in
26 2013);
- 27 c. *Conner v. JPMorgan Chase Bank, et al.*, 10-CV-1284 DMS (BGS) (S.D.
28 Cal.) (finally approved \$11,973,558);

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- 1 d. *In Re: Midland Credit Management, Inc., Telephone Consumer*
2 *Protection Act Litigation*, 11-md-2286-MMA (MDD) (S.D. Cal.)
3 (Counsel for a Plaintiff in the lead action, prior to the action being
4 recategorized through the multi-district litigation process; finally
5 approved for \$18 million);
- 6 e. *In Re: Portfolio Recovery Associates, LLC Telephone Consumer*
7 *Protection Act Litigation*, 11-md-02295-JAH (BGS) (Counsel for a
8 Plaintiff in the lead action, prior to the action being recategorized through
9 the multi-district litigation process; finally approved for \$18 million);
- 10 f. *Arthur v. SLM Corporation*, 10-CV-00198 JLR (W.D. Wash.)
11 (Nationwide settlement obtaining \$24.15 million; final approval granted
12 in 2012);
- 13 g. *Lo v. Oxnard European Motors, LLC, et al.*, 11-CV-1009-JLS-MDD
14 (S.D. Cal.) (Achieving one of the highest class member payouts in a
15 TCPA action of \$1,331.25 per claimant; final approval granted in 2012);
- 16 h. *Sarabri v. Weltman, Weinberg & Reis Co., L.P.A.*, 10-01777-AJB-NLS
17 (S.D. Cal.) (Approved as co-lead counsel and worked to obtain a national
18 TCPA class settlement where claiming class members each received
19 payment in the amount of \$70.00 per claimant; final approval granted in
20 2013);
- 21 i. *Barani v. Wells Fargo Bank, N.A.*, 12-CV-02999-GPC (KSC) (S.D. Cal.)
22 (Co-lead class counsel in a settlement under the TCPA for the sending of
23 unauthorized text messages to non-account holders in connection to wire
24 transfers; finally approved on March 6, 2015 for over \$1,000,000);
- 25 j. *Mills v. HSBC Bank Nevada, N.A.*, Case No. 12-CV-04010-SI (N.D.
26 Cal.) (Finally approved for \$39,975,000);
- 27 k. *Martin v. Wells Fargo Bank, N.A.*, 12-CV-06030-SI (N.D. Cal.);
- 28 l. *Heinrichs v. Wells Fargo Bank, N.A.*, 13-CV-05434-WHA (N.D. Cal.);

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- 1 m. *Newman v. ER Solutions, Inc.*, 11-CV-0592H (BGS);
- 2 n. *In Re Jiffy Lube International, Inc.*, MDL No. 2261 (Finally approved for
- 3 \$47,000,000.00 in value to the class);
- 4 o. *Jaber v. NASCAR*, 11-CV-1783 DMS (WVG) (S.D. Cal.);
- 5 p. *Ridley v. Union Bank, N.A.*, 11-CV-1773 DMS (NLS) (S.D. Cal.);
- 6 q. *Ryabyshchuk v. Citibank (South Dakota) N.A., et al.*, 11-CV-1236-IEG
- 7 (WVG);
- 8 r. *Sherman v. Kaiser Foundation Health Plan, Inc.*, 13-CV-0981-JAH
- 9 (JMA) (S.D. Cal.) (Settled for \$5,350,000 and finally approved on May
- 10 12, 2015; served as co-lead counsel);
- 11 s. *Rivera v. Nuvel Credit Company LLC*, 13-CV-00164-TJH-OP (E.D.
- 12 Cal.);
- 13 t. *Karayan v. Gamestop Corp.*, 3:12-CV-01555-P (N.D. Texas);
- 14 u. *Webb v. Healthcare Revenue Recovery Group*, 13-cv-00737-RS (N.D.
- 15 Cal.);
- 16 v. *Couser v. Comenity Bank*, 12-cv-02484-MMA-BGS (S.D. Cal. Oc. 2,
- 17 2014) (Finally approved for \$8,475,000 on May 27, 2015 as served as co-
- 18 lead counsel);
- 19 w. *Couser v. Apria Healthcare, Inc. et al.*, 13-cv-00035-JVS-RNB (C.D.
- 20 Cal. Oct. 27, 2014) (Finally approved on March 9, 2015 and served as
- 21 co-lead counsel);
- 22 x. *Rose v. Bank of America Corporation et al.*, 12-cv-04009-EJD (N.D.
- 23 Cal.) (Finally approved for \$32,000,000 in 2014);
- 24 y. *Newman v. AmeriCredit Financial Services*, 11-cv-03041-DMS-BLM
- 25 (S.D. Cal.) (finally approving TCPA settlement for over \$6,500,000 on
- 26 March 28, 2016);
- 27
- 28

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- 1 z. *Fox v. Asset Acceptance, LLC*, 14-cv-00734-GW-FFM (C.D. Cal. July 1,
2 2016) (finally approved TCPA class action for \$1,000,000; \$200,000
3 cash and \$800,000 debt relief);
- 4 aa. *Barrett v. Wesley Financial Group, LLC*, 13-cv-00554-LAB-KSC (S.D.
5 Cal.) (Class certification granted);
- 6 bb. *Gehrich v. Chase Bank, N.A.*, 12-cv-5510 (N.D. Cal.) (finally approved
7 for \$34,000,000);
- 8 cc. *Macias v. Water & Power Community Credit Union*, BC515936 (Los
9 Angeles Superior Court) (Class certification granted under the Rosenthal
10 Fair Debt Collection Practices Act; class action settlement finally
11 approved on April 21, 2016);
- 12 dd. *LaPuebla v. BirchBox, Inc.*, 3:15-cv-00498-BEN-BGS (S.D. Cal. 2016)
13 (finally approved settlement in unlawful auto-renewal action, allowing
14 class members to receive credits ranging from \$5 to \$20 toward future
15 purchases);
- 16 ee. *Stemple v. QC Holdings, Inc.*, 12-cv-01997-BAS-WVG (S.D. Cal. Nov.
17 7, 2016) (finally approved for \$1,500,000);
- 18 ff. *Abdeljalil v. GE Capital Retail Bank*, 12-cv-02078-JAH-MDD (S.D.
19 Cal.) (Class Certification granted and finally approved for \$7,000,000);
- 20 gg. *Barrow v. JPMorgan Chase Bank, N.A.*, 1:16-cv-03577-AT (N.D.Ga)
21 (preliminarily approved class settlement for \$2,250,000);
- 22 hh. *Hooker v. Sirius XM Radio Inc.*, 4:13-cv-00003-AWA-LRL (E.D.Va.
23 December 22, 2016) (Served as co-lead counsel in finally approved
24 TCPA class action settlement with a monetary fund of \$35,000,000);
- 25 ii. *Caldera v. Am. Med. Collection Agency*, 2017 U.S. Dist. LEXIS 99239
26 (C.D. Cal. June 27, 2017) (Order certifying nationwide TCPA class
27 action);
- 28

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1 jj. *Burkhammer v. Allied Interstate, LLC*, 2017 Cal. Super. LEXIS 109
2 (Sup. Ct. San Luis Obispo) (RFDCPA class action finally approved on
3 October 30, 2017);

4 kk. *Moreno-Peralta v. TRS Recovery Services, Inc.*, 2017 Cal. Super. LEXIS
5 548 (Sup. Ct. San Luis Obispo Oct. 10, 2017) (RFDCPA class action
6 finally approved);

7 ll. *Luster v. Wells Fargo Dealer Services, Inc.*, 15-cv-1058 (TWT) (N.D.
8 Ga. November 8, 2017) (TCPA class action finally approved in the
9 amount of \$14,834,058.00);

10 mm. *McPolin v. Credit Service of Logan*, 16-cv-116 BSJ (Utah District
11 Court) (FDCPA class action with consumers to each receive \$1,428.57,
12 debt relief, and tradeline deletion finally approved on November 9,
13 2017).

14 nn. *Reid v. I.C. System, Inc.*, 2017 U.S. Dist. LEXIS 43770 (D.Ariz. March
15 24, 2017) (TCPA class actions finally approved in the amount of
16 \$3,500,000);

17 oo. *Couser v. Dish One Satellite, LLC*, 5:15-cv-02218-CBM-DTB (C.D. Cal.
18 November 21, 2017) (TCPA class action preliminarily approved in the
19 amount of \$935,000).

20 27. I have litigated many putative class action cases under California Penal Code
21 630, *et seq.* (several of which have been given final approval as class action
22 settlements), including but not limited to the following cases:

23 a. *Knell, et al. v. FIA Card Services, N.A.*, 13-CV-01653-AJB-WVG (S.D.
24 Cal.) (California class action settlement under Penal Code 632, *et seq.*,
25 for claims of invasion of privacy. Settlement resulted in a common fund
26 in the amount of \$2,750,000; finally approved in August 15, 2014);

27 b. *Hoffman v. Bank of America Corporation*, 12-CV-00539-JAH-DHB
28 (S.D. Cal.) (California class action settlement under Penal Code 632, *et*

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1 *seq.*, for claims of invasion of privacy. Settlement resulted in a common
2 fund in the amount of \$2,600,000; finally approved on November 6, 2014
3 and served as co-lead counsel);

4 c. *Mount v. Wells Fargo Bank, N.A.*, BC395959 (Sup. Ct. Los Angeles)
5 (finally approved for \$5,600,000 in action under Cal. Pen. Code § 630, *et*
6 *seq.*);

7 d. *Zaw v. Nelnet Business Solutions, Inc. et al.*, No. 13-cv-05788-RS (N.D.
8 Cal.) (finally approved in 2014 for \$1,188,110 in action under Cal. Pen.
9 Code § 630, *et seq.*);

10 e. *Medeiros v. HSBC Bank Nevada, N.A.*, 3:14-cv-01786-JLS-MDD (S.D.
11 Cal. 2017) (Finally approved action under Penal Code 632, *et seq.* for
12 \$13,000,000);

13 f. *Dake v. Receivables Performance Management, LLC*, 5:12-cv-01680-
14 VAP-SP (C.D. Cal.);

15 g. *Garcia v. Earthlink, Inc.*, 3:12-CV-01129-DMS-BLM (S.D. Cal.);

16 h. *Montegna v. Portfolio Recovery Associates, LLC*, 3:12-cv-00764-MMA-
17 BGS (S.D. Cal.).

18 28. With regard to cases involving false advertising, in the last few years I have
19 settled, or am in the process, several cases, including but not limited to:

20 a. *Maxin v. RHG & Company, Inc.*, 2017 U.S. Dist. LEXIS 27374 (S.D.
21 Cal. February 27, 2017) (finally approved class action settlement for
22 \$900,000);

23 b. *Scheuerman v. Vitamin Shoppe Industries, Inc.*, BC592773 (Los
24 Angeles Superior Court) (finally approved class action settlement for
25 up to \$638,384);

26 c. *Oxina v. Lands' End, Inc.*, 3:14-cv-02577-MMA-NLS (S.D. Cal.
27 2016) (finally approved settlement under California Made in the USA
28 statute);

1 d. *Giffin v. Universal Protein Supplements*, BC613414 (Los Angeles
2 Superior Court) (Finally approved, class received over \$210,000).

3 e. *Holt, et al. v. FoodState Inc.*, 17-CV-00637-LM (District of New
4 Hampshire, 2017) (pending preliminary approval for \$2.1 million).

5 29. Many of the cases listed above, which have settled, resulted in the creation
6 of combined common funds and/or distribution to class member in the
7 hundreds of millions of dollars. The outstanding results mentioned above
8 are a direct result of the diligence and tenacity shown by Kazerouni Law
9 Group, APC and myself, in successfully prosecuting complex class actions.

10 **ADDITIONAL RELEVANT TRAINING,**

11 **SPEAKING/TEACHING ENGAGEMENTS AND ASSOCIATIONS**

12 30. I am an adjunct professor at California Western School of Law where I teach
13 a three-credit course in consumer law, including CIPA.

14 31. The following is a list of recent training conferences I attended:

- 15 a. Four-day National Consumer Law Center Conference; Nashville, TN –
16 2008;
- 17 b. Three-day National Consumer Law Center Conference; Portland, OR -
18 2008;
- 19 c. Three-day National Consumer Law Center Conference; San Diego, CA -
20 2009;
- 21 d. Three-day National Consumer Law Center Conference; Seattle, WA -
22 2011;
- 23 e. National Consumer Law Center Conference in 2013;
- 24 f. National Consumer Law Center Conference in 2014;
- 25 g. National Consumer Law Center Conference in 2015;
- 26 h. National Consumer Law Center Conference in 2016;
- 27 i. Three-day CAALA Conference; Las Vegas, NV – 2009;
- 28 j. Three-day CAALA Conference; Las Vegas, NV – 2013;

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- 1 k. Three-day CAALA Conference; Las Vegas, NV – 2015;
- 2 l. Three-day CAALA Conference; Las Vegas, NV – 2016;
- 3 m. Three-day CAOC Conference – 2014 and 2015;
- 4 n. Speaker at ABA National Conference, Business Litigation Section;
- 5 Trends in Consumer Litigation; San Francisco, CA – 2013;
- 6 o. Speaker at the ABA TCPA National Webinar (Consumer Protection,
- 7 Privacy & Information Security, Private Advertising Litigation, and
- 8 Media & Technology Committees) – September 2013;
- 9 p. Spoke at the 2014 ACA Conference in November 2014;
- 10 q. Speaker at ACI Conference in Dallas, TX in September of 2016
- 11 concerning The Borrower's Perspective: Insight From The Plaintiffs' Bar
- 12 and Consumer Advocates;
- 13 r. Speaker on TCPA panel in September of 2016 at the Annual Consumer
- 14 Financial Services Conference; and,
- 15 s. Due to speak at the 2016 CAOC Conference in November of 2016.

16 32.As one of the main plaintiff litigators of consumer rights cases in the
17 Central District of California, I have been requested to and have made
18 regular presentations to community organizations regarding debt collection
19 laws and consumer rights, including the Telephone Consumer Protection
20 Act (“TCPA”) and California Invasion of Privacy Act (“CIPA”). These
21 organizations include Whittier Law School, Iranian American Bar
22 Association, Trinity School of Law and Chapman Law School, University
23 of California, Irvine, and California Western School of Law.

24 33.I was the principal anchor on Time Television Broadcasting every Thursday
25 night as an expert on consumer law generally, and the TCPA specifically,
26 between 2012 and 2013.

27 34.I was named Rising Star by San Diego Daily Tribune in 2012, and Rising
28 Star in Super Lawyers Magazine in 2013, 2014 and 2015. I was named a

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1 Super Lawyer by Super Lawyers Magazine in 2016, 2017, 2018, 2019 and
2 2020.

3 35.I lectured in Class Action Trends at the CAOC 2015 Conference in San
4 Francisco.

5 36.I was selected for membership into The National Trial Lawyers: Top 40
6 Under 40 in 2016.

7 37.I was a panelist in a webinar, ABA Telephonic Brown Bag re: TCPA, on
8 August 25, 2015.

9 38.I lectured in Class Action Trends at the CAOC 2015 Conference in San
10 Francisco, California.

11 39.In January of 2016, I spoke on the impact of the Federal Communications
12 Comission's 2015 Declaratory Ruling on TCPA litigation at the ABA
13 National Convention in Salt Lake City, Utah.

14 40.In May of 2016, I spoke on Class Action Trends at the CAOC seminar in
15 Palm Springs, California.

16 41.In August of 2018, I was one of three presenters on another national
17 webinar on the TCPA titled "From Both Sides: Plaintiff and Defense
18 Perspective on the TCPA".

19 42.In August of 2018, I was one of two presenters on a national webinar on the
20 TCPA titled "TCPA Takes a New Turn With the 9th Circuit's Ruling in
21 *Marks v. Crunch San Diego, LLC*."

22 43.I lectured on the TCPA before the ABA Business Law Section, Consumer
23 Financial Services Committee in January 2016 at an event in Utah entitled,
24 "Impact of the FCC's 2015 Rulings on TCPA Litigation."

25 On January 11, 2019, I spoke on a panel entitled "TCPA Litigation: Where
26 is it Heading Now?" at the 2019 Annual American Bar Association
27 Conference in Miami.

28 44.In 2016, I wrote an article entitled "Finding a Balance" that was published

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1 in the Nutrition Business Journal, concerning a lawsuit filed under the
2 Racketeer Influenced and Corrupt Organization Act.

3 45.I was published in the Daily Journal in September of 2016, with the title,
4 “The FDCPA: The Forgotten Statute.”

5 46.I am often called upon to give legal analysis on popular television and radio
6 shows such as Dr. Drew Midday Live and Fox 5.

7 47.In March of 2016, I moderated the Judges Panel on Class Action Trends
8 and Federal Litigation Trends at the NCLC Conference.

9 48.I spoke on privacy rights on a panel before the California State Bar
10 Convention in 2016.

11 49.I spoke at the 22nd National Forum on Residential Mortgage Litigation &
12 Regulatory Enforcement conference on January 22, 2017.

13 50.Presented at the 2017 CAOC seminar in Palm Springs, California.

14 51.Speaker at national webinar on June 7, 2017 for the CAOC, entitled,
15 “Understanding the Fair Debt Collection Practices Act”, and again on
16 August 1, 2018.

17 52.I wrote an article entitled, *Collateral Damage, Beyond the personal injury:*
18 *When creditors and collection agencies stalk your client*, published in the
19 September 2017 edition of Plaintiff magazine.

20 53.Speaker at National Webinar by the ABA Consumer Financial Services
21 Committee on TCPA Update – “The D.C. Circuit’s TCPA Decision on the
22 FCC Ruling, held on March 22, 2018.

23 54.Spoke at 2018 Inland Empire CAOC Convention on “Class Action Hot
24 Topics” - May 2018.

25 55.Speaker on the FDCPA at National Consumer Law Center’s National
26 Convention in Las Vegas in March, 2019.

27 56.I am a member in good standing of the following local and national
28 associations:

KAZEROUNI LAW GROUP, APC
245 FISCHER AVENUE, UNIT D1
COSTA MESA, CA 92626

- 1 a. Consumer Attorneys Association of Los Angeles;
- 2 b. The Orange County Bar Association;
- 3 c. Orange County Trail Lawyers Association;
- 4 d. Twice served as former President of the Orange County Chapter of
- 5 the Iranian American Bar Association;
- 6 e. Member in good standing of National Association of Consumer
- 7 Advocates;
- 8 f. Member of Consumer Attorneys of California;
- 9 g. Member of the Federal Bar Association;
- 10 h. Member of the Leading Forum of the American Association of
- 11 Justice;
- 12 i. Member of the American Bar Association;
- 13 j. Member of the Western Trial Lawyers Association;
- 14 k. Public Justice Foundation.

15 57. In addition to my class action experience, I have experience in commercial
16 litigation and large-scale products liability litigation including a \$2.5 million
17 dollar settlement in *Mei Lu Hwei, et al v. American Honda Motor Co., Inc.*,
18 et al. (Case No. BC401211 in Superior Court of California for County of Los
19 Angeles). I have regularly litigated cases in state and federal courts, and
20 have reached numerous confidential seven-figure settlements against
21 internationally known companies.

22 **EXHIBIT**

23 58. Attached hereto as Exhibit A is a true and correct copy of the expense
24 records for Kazerouni Law Group, APC, for this action, kept
25 contemporaneously.

26
27 I declare under penalty of perjury under the laws of California and the
28 United States of America that the foregoing is true and correct, and that this

KAZEROUNI LAW GROUP, APC
245 FISCHER AVENUE, UNIT D1
COSTA MESA, CA 92626

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declaration was executed on September 19, 2019.

By: /s/ Abbas Kazerounian
ABBAS KAZEROUNIAN

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:

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

1 DATED this 26th day of September, 2019.

2 TERRELL MARSHALL LAW GROUP PLLC

3
4 By: /s/ Adrienne D. McEntee, Pro Hac Vice

5 Adrienne D. McEntee, *Pro Hac Vice*

6 Email: amcentee@terrellmarshall.com

7 936 North 34th Street, Suite 300

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