

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

**KAZEROUNI LAW GROUP, APC**  
Abbas Kazerounian, Esq. (249203)  
ak@kazlg.com  
Matthew M. Loker, Esq. (279939)  
ml@kazlg.com  
245 Fischer Avenue, Unit D1  
Costa Mesa, CA 92626  
Telephone: (800) 400-6808  
Facsimile: (800) 520-5523

**LAW OFFICES OF DOUGLAS J. CAMPION, APC**  
Douglas J. Campion, Esq. (75381)  
doug@djcampion.com  
17150 Via Del Campo, Suite 100  
San Diego, CA 92127  
Telephone: (619) 299-2001  
Facsimile: (619) 858-0034

**HYDE & SWIGART**  
Joshua B. Swigart, Esq. (225557)  
josh@westcoastlitigation.com  
2221 Camino del Rio South, Suite 101  
San Diego, CA 92108  
Telephone (619) 233-7770  
Facsimile: (619) 297-1022

*Attorneys for Plaintiff,*  
Lillian Franklin

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**LILLIAN FRANKLIN,  
INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,**

Plaintiff,

v.

**WELLS FARGO BANK, N.A.,**

Defendant.

**Case No.:** 14-cv-2349 MMA (BGS)

**DECLARATION OF LISA  
MULLINS IN SUPPORT OF  
MOTION FOR AWARD OF  
ATTORNEYS' FEES, COSTS, AND  
INCENTIVE AWARD FOR  
PLAINTIFF**

**DATE:** July 20, 2015  
**TIME:** 2:30 p.m.  
**COURTROOM:** 3A

**HON. MICHAEL M. ANELLO**

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1 I, LISA MULLINS, declare:

2 1. I am the President of ILYM Group, Inc. (“ILYM Group”) and have  
3 been assigned to administer the above-captioned matter. I have personal  
4 knowledge of the facts herein, and, if called upon to testify, I could and would  
5 testify competently to such facts. I am preparing this declaration at the request of  
6 Plaintiffs’ counsel to file in support of their request for attorneys’ fees and costs,  
7 including their request that ILYM Group’s costs of notice and claims  
8 administration be paid from the Settlement Fund. This declaration is to apprise  
9 the Court of that intent.

10 2. Because the claims period deadline of June 9, 2015 has not yet  
11 passed, and the deadline of June 19, 2015 for opting out or objecting has also not  
12 yet passed, I will therefore file a declaration with all the information about the  
13 notice, and final number of claims, opt-outs and objections no later than fourteen  
14 (14) prior to the hearing.

15 3. ILYM group has extensive experience in providing notice of Class  
16 Actions and administering Class Action Settlements.

17 4. ILYM Group’s responsibilities are outlined in the Settlement  
18 Agreement in this matter.

19 5. We received the class data files from Defendants, which contained a  
20 total of 4,076,207 telephone numbers (“Class List”) and 3,666,588 names and  
21 addresses (“Notice List”) (see Settlement Agreement, Section 10.03).

22 6. The data files of names and addresses and cellphone numbers was  
23 uploaded to our database and checked for duplicates and other possible  
24 discrepancies. The final mailing list contained 3,666,588 names and addresses  
25 from the Notice List and all had a cellphone telephone number linked to them.

26 7. However, there were a number of cellphone numbers in the “Class  
27 List” in addition to those in the “Notice List”, representing persons that received  
28 calls intended for Wells Fargo’s customers but are not identified by name within  
Wells Fargo’s records and, hence, were not be within the Notice Database and

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1 Class List, and therefore will have likely learned of the Settlement by publication  
2 and / or internet notice. See Settlement Agreement, Section 10.03. Those persons  
3 can make a claim even if they are not on the Notice List by advising us of their  
4 cellphone number on which they think they may have been called. We then  
5 compare that number to the numbers on the Class List, and if their cellphone  
6 number is on the Class List, they can then file a claim.

7 8. The approximate total class size is 4,076,207, which is comprised of  
8 the 3,666,588 included in the Notice List and the 409,619 additional cellphone  
9 numbers in the Class List mentioned above.

10 9. On March 11, 2015, ILYM Group mailed notice to 3,666,588 Class  
11 members in the form of a postcard-type notice approved by the Court.

12 10. As of May 19, 2015, ILYM has received 103,867 claims in this  
13 matter.

14 11. As of May 19, 2015, ILYM Group has received thirty-three (33) opt-  
15 out requests.

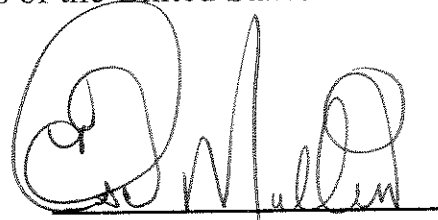
16 12. As of May 19, 2015, ILYM Group has received zero (0) objections to  
17 settlement.

18 13. Our initial administration estimate for this case was \$2,987,795.18.  
19 Memo of Ps & As for Preliminary Approval, ECF 5-1 at 5.

20 14. As of May 19, 2015, ILYM Group has incurred \$2,523,401.40 in  
21 administration costs for this matter. Our costs to date are of course tentative, since  
22 the claims period is not over, the number of claims is not known and we can not  
23 predict our future costs associated with the administration of this case. Therefore,  
24 we will be submitting a finalized costs declaration prior to the Final fairness  
25 Hearing contining what we expect our final costs will be. We are requesting that  
26 the Court allow the costs related to the notice and claims administration to be paid  
27 from the Settlement amount upon Final Approval.

28 15. As of this date, we have complied with all requirments set forth in the  
Settlement Agreement.

1 I declare under penalty of perjury that the foregoing is true and correct.  
2 Executed on May 19, 2015, pursuant to the laws of the United States and the State  
3 of California at Irvine, California.



Lisa Mullins

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