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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 DANIEL
FORDE IN SUPPORT OF
PLAINTIFFS' HOURLY RATES**

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

HON. MICHAEL M. ANELLO

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COSTA MESA, CA 92626

1 I, Daniel Forde, declare under penalty of perjury pursuant to the laws of the State
2 of California, and the United States of America, that the following statements are
3 true:

- 4 1. I regularly practice before the Southern District of California and am familiar
5 with the hourly rates charged by attorneys who practice in California District
6 Courts, including this Court.
- 7 2. I am a Partner with the firm of Hoffman & Forde. I have been licensed to
8 practice law in the State of California for eight years. A large part of my
9 practice focuses on consumer related issues and litigation. These cases
10 include both individual actions as well as complex class actions.
- 11 3. The hourly rate in California State Courts for an attorney with Joshua B.
12 Swigart's experience and expertise in consumer litigation would be in the
13 range of \$595.00 per hour for this type of litigation. Therefore, \$595.00 per
14 hour would be a reasonable and appropriate hourly rate for Mr. Swigart.
- 15 4. The hourly rate in California State Courts for an attorney with Abbas
16 Kazerounian's experience and expertise in consumer litigation would be in
17 the range of \$560.00 per hour for this type of litigation. Therefore, \$560.00
18 per hour would be a reasonable and appropriate hourly rate for Mr.
19 Kazerounian.
- 20 5. I have known Mr. Swigart; and, Mr. Kazerounian for several years, and I am
21 familiar with their legal work, as we have similar consumer law practices and
22 both practice in California Federal Courts.

23
24 I declare under penalty of perjury of the laws of California and the United
25 States that the foregoing is true and correct

26
27 Date: May 18, 2015

BY: /s/ DANIEL FORDE
DANIEL FORDE, ESQ.