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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 SCHUYLER  
HOFFMAN 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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1 I, Schuyler Hoffman, declare under penalty of perjury pursuant to the laws of the  
2 State of California, and the United States of America, that the following  
3 statements are 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 seven 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/ SCHUYLER HOFFMAN  
SCHUYLER HOFFMAN, ESQ.