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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 LILLIAN
FRANKLIN IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

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

HON. MICHAEL M. ANELLO

DECLARATION OF LILLIAN FRANKLIN

I, LILLIAN FRANKLIN, declare:

1. I am the Plaintiff in this action, and was approved in the Court’s Preliminary Approval Order to serve as Class representative in this action.
2. I submit this declaration in support of Plaintiff’s Motion for Final Approval of the Class Action settlement. If called as a witness, I would competently testify to the matters herein from personal knowledge.
3. I have participated in the litigation of this action throughout the case as detailed in the declaration I filed in support of the Motion for Preliminary Approval and for Attorneys’ Fees, Costs of Litigation and Incentive Payments to be heard at the time of the Final Approval Motion. I have discussed the terms of the settlement with Class Counsel prior to the entry of the Preliminary Approval Oder and understand those terms. I have read and signed the Settlement Agreement filed in support of Preliminary Approval.
4. I understand that as of the date of this filing there were 107,134 valid claims. Because the amount to be paid out in claims will be paid on a pro rata basis, each of the claimants will divide the entire amount remaining in the Settlement Fund, after deducting attorneys’ fees and costs of litigation and any incentive payment awarded by the Court. Based on the current request for attorney fees and cost estimate provided by the claims administrator, as of the date of filing, it is my understanding that each class member should receive approximately \$71.16.
5. I understand that nine objections have been filed with regard to this settlement; however, three objections have been withdrawn.
6. I also understand that 59 consumers validly requested to be excluded from this class action has been filed either.
7. As a result, I believe that is a further indication of the merits of the settlement and is a reason for granting final approval.

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1 8. I support the final approval of this settlement and believe the settlement is
2 fair and reasonable.

3
4 I declare under penalty of perjury of the laws of California and the United
5 States that the foregoing is true and correct, and that this declaration was executed
6 in San Diego, CA on July 20, 2015

7
8 By Lillian J Franklin
9 LILLIAN FRANKLIN

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