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11 *Attorneys for Plaintiffs*
and the Proposed Class

12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15

16 MAUDER and ALICE CHAO; DEOGENESO
and GLORINA PALUGOD, and MARITZA
17 PINEL, individually and on behalf of all others
similarly situated,

18 Plaintiffs,

19 v.

20 AURORA LOAN SERVICES, LLC,

21 Defendant
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No. 10-cv-03118-SBA

CLASS ACTION

DECLARATION OF THOMAS E.
LOESER IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND SERVICE
AWARDS

Hearing Date: January 13, 2015

Hearing Time: 1:00 p.m.

Courtroom 210

Hon. Sandra B. Armstrong

1 I, Thomas E. Loeser, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

2 1. This declaration is based upon my personal knowledge.

3 2. I am an attorney currently licensed in good standing to practice law in the states of
4 California and Washington, as well as the District of Columbia. I am a Partner at the law firm
5 Hagens Berman Sobol Shapiro LLP (“Hagens Berman”), which is Class Counsel in this action.

6 3. I have been actively engaged in the practice of law since 1999. In 1999, I graduated
7 from Duke University School of Law with high honors and I was elected to the *Order of the Coif*. I
8 was an articles editor for Duke’s law journal, *Law and Contemporary Problems*. Prior to law
9 school, I was a financial analyst at the Hewlett-Packard Company and prior to that, a Treasury
10 Analyst at Microsoft. In 1994, I obtained an MBA from the University of Washington with honors
11 and was elected to *Beta Gamma Sigma*, the national business school honor society.

12 4. Following law school, I was a technology lawyer at Wilson Sonsini Goodrich &
13 Rosati in Silicon Valley. In 2002, I was appointed to be a Federal Prosecutor in Los Angeles,
14 where I was a member of the Cyber and Intellectual Property Crimes Section. As an Assistant
15 United States Attorney I prosecuted well over one hundred criminal matters, appeared hundreds of
16 times in federal court and was lead trial counsel in 12 federal jury trials. I also briefed and argued
17 over a dozen cases in the Ninth Circuit Court of Appeals. In late 2006, my family and I moved
18 back to Seattle, where I have practiced exclusively in the area of complex litigation, class actions
19 and *qui tam*.

20 5. A copy of my firm’s resume was submitted as Exhibit C to my May 15, 2014
21 Declaration, Dkt. No. 219-3, and is incorporated herein by reference.

22 6. Hagens Berman is a nationally recognized leader in the plaintiffs’ class action bar. It
23 has been involved in many of the largest and most significant class actions in the United States.
24 Recent California cases include: *Reyes v. Wells Fargo*, No. 10-01667-JCS; *Jackmon v. America’s*
25 *Servicing Co., et al.*, No. 11-cv-03884-CRB (pending); *Cheeks v. Fidelity & Deposit Co. of*
26 *Maryland, et al.*, No. 4:13-cv-01854-SBA (pending); *Clements v. JPMorgan Chase Bank, N.A.*,
27 No. 12-cv-02179-JCS (settled); *In re Hyundai & Kia Fuel Economy Litig.*, 2:13-ml-02424-GW-

1 FFM (C.D. Cal.) (settlement pending); *Kearney v. Hyundai Motor Co.*, 09-cv-01298-JST (C.D.
 2 Cal.) (settled); *Circulli v. Hyundai Motor America*, 08-cv-00854-AG (C.D. Cal.) (settled); *Polanco*
 3 *v. Schneider National Carriers, Inc.*, 10-cv-04565-GHK (C.D. Cal.) (settled); *Ruwe v. Cellco*
 4 *Partnership d/b/a Verizon Wireless*, No. 07-cv-03679-JSW (N.D. Cal.) (settled); *Thomas v. Sprint*
 5 *Solutions, Inc., et al.*, No. 08-cv-05119-THE (N.D. Cal.) (pending); *Pecover v. Electronic Arts Inc.*,
 6 No. 08-cv-02820-CW (N.D. Cal.) (settled); *In re Optical Disk Drive Prods. Antitrust Litig.*, No.
 7 10-md-02143-RS (N.D. Cal.) (on appeal); *In re Lithium Ion Batteries Antitrust Litig.*, No. 13-md-
 8 02420-YGR (N.D. Cal.). State court matters include: *Bates v. KB Homes*, No. RG-08-384954
 9 (Alameda County Sup. Court, J. Brick) (settled); *Alexander v. Solvay Pharms., Inc.*, BC300364
 10 (Los Angeles Sup. Court) (settled); *In re iPod Nano Cases*, JCCP No. 4469 (Los Angeles Sup.
 11 Court) (settled); *Randall v. Costco Wholesale Corp.*, BC296369 (Los Angeles Sup. Court)
 12 (settled); *Reed v. SunRun, Inc.*, BC498002 (Los Angeles Sup. Court) (pending).

13 7. Hagens Berman has been involved in this litigation for over four years. Hagens
 14 Bermans' work on this case has included all aspects of the litigation, including research,
 15 preparation of pleadings, discovery, mediation and settlement, the approval and notice process, this
 16 motion, and the forthcoming motion for final approval of settlement. Hagens Berman took a
 17 leading role in the prosecution of the case, including advancing over \$140,000 in costs associated
 18 with housing and reviewing the over eight million pages of discovery produced by Aurora.

19 8. Hagens Berman, Law Office of Andrew Oldham, Abtahi Thigpen LLP, and
 20 Richardson, Patrick, Westbrook & Brickman, LLC have litigated this Case tenaciously for over
 21 four years, fronting all costs and working on a contingency basis against the effectively boundless
 22 resources of what was the Lehman Brothers empire. At every stage of this litigation, Aurora –
 23 through nationally recognized class action defense counsel – vigorously contested Plaintiffs'
 24 claims, Plaintiffs' discovery requests, and Plaintiffs' efforts to certify their claims as a class action.
 25 However, Class Counsel persevered and ***expended thousands of hours prosecuting this case***,
 26 including reviewing over ***eight million pages of documents***; preparing for and taking or defending
 27 ***approximately a dozen depositions***; and preparing and submitting voluminous filings in opposition

1 to *four different dispositive motions*, and in support of *two motions for class certification*, among
2 other countless discovery disputes and filings. Aurora even attempted to depose Class Counsel and
3 seek his disqualification.

4 9. Plaintiffs took on significant risk, real and perceived, in suing a large bank that
5 serviced their home mortgage loans, and performed their duties admirably over the course of this
6 case.

7 10. Class Counsel obtained a non-reversionary claims-paid settlement whereby the
8 entire Net Settlement Fund will automatically be paid directly to Class members to the extent they
9 are locatable via a robust notice process. Such “check-in-the-mail” payments represent an excellent
10 result in a Class settlement of this type. In additional, just to be sure that Aurora’s records of
11 payments received are correct, Class Members may, but are not required to, document the
12 forbearance agreements that they were sent and the payments that they made to Aurora thereunder.

13 11. Injunctive relief was not necessary and is not a part of the settlement in this case
14 because Aurora Loan Services sold its entire servicing portfolio of loans to third parties, is no
15 longer an operating entity, and is being wound-up as part of the Lehman Brothers bankruptcy.

16 12. The Class Notice discloses that Class Counsel will seek an attorney fee award of
17 30% of the gross settlement fund, plus expenses. It further proposes a service award for the
18 representative plaintiff “not to exceed \$7,500.” *See* Notice of Class Action Settlement (*available*
19 *at* <http://www.auroraworkoutagreementsettlement.com/case-documents.aspx>).

20 13. Class Counsel is not filing its actual billing time records with this motion, nor
21 posting them on the website, but is prepared to provide the records to the Court for immediate *in*
22 *camera* review upon request.

23 14. Hagens Berman did not use the possibility of an incentive award to pressure the
24 Chaos and the Palugods to accept the settlement. During and after the mediation in this case,
25 Andrew Oldham and I communicated with the Chaos and Palugods to explain the risks of
26 litigation, the proposed settlement relief, and its fairness to the Class. Based upon these
27 communications, I believe that the Chaos and Palugods understood and agreed that their duty as the

1 representative plaintiffs was to serve the interests of the Class as a whole, and that they would
2 receive no special treatment compared to other Class members. The Chaos and the Palugods were
3 informed of the possibility of a modest service award that would recognize their efforts in bringing
4 this litigation, cooperating with Class Counsel in discovery, and discussing the best possible
5 resolution of this case when viewed against risk factors. The Chaos and the Palugods were also
6 informed that any such service award would be subject to the complete discretion of the Court and
7 that an award of this sort cannot be promised. To my knowledge, our clients expected nothing in
8 particular in exchange for their service as class representatives, other than fair and customary
9 treatment in recognition of their service.

10 15. Class counsel made clear to the Chaos and Palugods that they had the right to
11 support, object to, or comment on the settlement in this case without affecting the possibility of a
12 service award. Hagens Berman is informed and believes that the Chaos and the Palugods' decision
13 to sign and support the settlement had nothing to do with the possibility of obtaining a service
14 award.

15 **Fees and Expenses Incurred in This Litigation**

16 16. I personally rendered the majority of all Hagens Berman legal services in this case,
17 and was personally responsible for additional staffing and activity conducted on Plaintiffs' behalf
18 by paraprofessionals at my firm, including overseeing all services rendered.¹ Based on my
19 activities and oversight in this case, as well as my review of my firm's billing records maintained
20 in this case, I have personal knowledge of the time attorneys and paraprofessionals at my firm
21 spent rendering services on behalf of Plaintiffs, the hourly rates charged for those services, and the
22 necessary costs incurred in the normal course of this litigation.

23 17. My Partner, Chris O'Hara, is the lawyer at the firm who manages all interactions
24 with third-party claims administrators and escrowing banks. His time charged to this case was

25 _____
26 ¹ The scope of my supervision, of course, excludes my supervisor, Managing Partner Steve
27 Berman, with whom I consulted at important junctures during the case initiation and mediation
28 process.

1 spent reviewing and editing the materials sent to Settlement Class members, and managing the
2 relationships with the Claims Administrator and Settlement Fund escrowing bank.

3 18. Managing Partner, Steve Berman, who billed seven hours to this case, was
4 consulted by me during case initiation and the mediation process and provided important guidance
5 toward case resolution.

6 19. Exhibit A attached hereto sets forth time expended by attorneys and
7 paraprofessionals at Hagens Berman from July 2, 2013, through May 30, 2014, split into six
8 categories based upon the purpose of the work. However, to ease the burden on the Court, Hagens
9 Berman has written off the time of ten timekeepers who each had total billings below \$10,000. This
10 write-off totaled approximately \$30,000. Hagens Berman's billing records are based on routine,
11 contemporaneous timekeeping in increments of one-tenth hour. Those six categories can be further
12 dissected into the particular project involved, but generally include the following: initial factual and
13 legal research into the case; discovery; preparing for and attending hearings; legal briefing;
14 preparing for mediation and holding extensive settlement talks; and substantial work preparing
15 papers for preliminary approval, notice and settlement damages distribution.

16 20. The rates of Hagens Berman professionals who billed this case and whose time has
17 not been written off are as follows:

Timekeeper	Position	Total Hours	Rate/Hour	Total
Steve Berman	Managing Partner	7	\$900	\$6,300
Thomas Loeser	Partner	1,486.9	\$650	\$966,453
Chris O'Hara	Partner	17.5	\$575	\$10,063
R. Haegele	Senior Paralegal	119.3	\$170	\$20,273
L. Kunzler	Investigator	597.5	\$170	\$101,575
Total		2228.2	Avg: \$496	\$1,104,663

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24 21. Based on my knowledge and experience, the rates charged by the attorneys and
25 paraprofessionals at my firm are the same as charged for non-contingent legal services by my law
26 firm, and are within the range of rates normally and customarily charged in the Northern District of
27 California by attorneys and paraprofessionals of similar qualifications and experience in cases of

1 this kind. My hourly rate and the hourly rates of the other attorneys and paraprofessionals from
2 Hagens Berman who worked on this case have been approved in class cases in the Northern
3 District of California, and throughout the United States.

4 22. As the primary attorney assigned to this case at Hagens Berman, fees for my time
5 constitute about 87.5% of the total fees that Hagens Berman incurred in this case. Biographies of
6 all billers are provided below.

- 7 • **Steve W. Berman** (Rate: \$900/hr; \$6,300 total fees charged to this case):

8 23. Mr. Berman helped found the firm in 1993, and he is its managing partner. He has
9 served as lead or co-lead counsel in antitrust, securities, consumer, and products liability litigation,
10 as well as other complex litigation, including MDL actions, throughout the country. For example,
11 Mr. Berman was the lead trial lawyer in *In re Pharm. Indus. Average Wholesale Price Litig.*, MDL
12 No. 1456 (D. Mass.). He tried the class case against four manufacturers and successfully argued the
13 appeal from the trial before the First Circuit. The case resulted in settlements with dozens of
14 pharmaceutical companies, with consumers receiving three times their actual damages. Mr. Berman
15 was also the lead counsel in *New England Carpenters v. First DataBank, et al.*, No. 05-11148-PBS
16 (D. Mass.), on behalf of a nationwide class of private payors that purchased prescription brand-name
17 drugs. In that case, Hagens Berman achieved a \$350 million settlement 11 days before trial was
18 scheduled to start. Judge Patti Saris awarded the firm a healthy multiplier for its initiative in
19 uncovering the scheme at issue and for its quality work. Additionally, Mr. Berman was lead counsel
20 in *In re Charles Schwab Corp. Secs. Litig.*, No. 08-cv-01510 (N.D. Cal.), a recent securities class
21 action before this Court, that settled on the eve of trial, while the parties were arguing *in limine*
22 motions, for some \$235 million. This resulted in a 42.5% recovery for the federal class and an 80%
23 recovery for the California class.

24 24. Recently, in *In re Toyota Motor Corp. Unintended Acceleration Mktg., Sales*
25 *Practices, & Prods. Liab. Litig.*, No. 8:10ML2151 JVS (FMOx) (C.D. Cal.), Judge James V. Selna
26 *sua sponte* identified Mr. Berman as a presumptive co-lead counsel when Judge Selna was
27 assigned the Toyota MDL. The case settled for \$1.6 billion and was approved by Judge Selna. It is

1 the largest auto settlement, both in terms of class members and recovery, in U.S. history. And even
 2 more recently, Mr. Berman and Hagens Berman were appointed co-lead counsel in the *In re*
 3 *Electronic Books Antitrust Litig.*, No. 1:11-md-02293(DLC) (S.D.N.Y.) (“*E-books*”), and in *In re*
 4 *Carrier IQ Consumer Privacy Litig.*, No. 12-md-2330-EMC (N.D. Cal.). In the *E-books* case,
 5 settlements with all five of the publisher defendants are pending. These settlements amount to over
 6 76% of single damages with two publishing defendants paying in excess of 100% of single
 7 damages. The remaining defendant, Apple, is on the hook for the remaining single damages and
 8 treble damages should plaintiffs prevail.

9 25. Perhaps most notable is Mr. Berman’s role as a special assistant attorney general for
 10 the states of Washington, Arizona, Illinois, Indiana, New York, Alaska, Idaho, Ohio, Oregon,
 11 Nevada, Montana, Vermont, and Rhode Island in the landmark Tobacco Litigation. That case
 12 resulted in the largest settlement in history, a settlement that occurred while Mr. Berman was in
 13 trial in *State of Washington v. Philip Morris, et al.* The *National Law Journal* recently named him
 14 as one of the most 100 influential lawyers in the United States.

- 15 • **Thomas E. Loeser** (Rate: \$650/hr; \$966,453 in total fees charged to this case):

16 26. A summary of my experience and qualifications are set forth above in Paragraphs 3-
 17 4. My experience as lead or co-lead counsel in California consumer class actions include: *Bates v.*
 18 *KB Homes*, No. RG-08-384954 (Alameda Cnty. Sup. Ct., J. Brick), resulting in a \$7.1 million
 19 settlement that paid each class member over 100% of the fees that were illegally charged by KB
 20 Home’s captive escrow company; *Reyes v. Wells Fargo Bank, N.A.*, No. 3:10-cv-01667-JCS (J.
 21 Spero), recently settled for 100% of the damages allowed under California’s Rosenthal Unfair Debt
 22 Collection Practices Act; *In re: Carrier IQ Consumer Privacy Litig.*, No. 12-md-2330-EMC
 23 (Hagens Berman was recently appointed co-lead counsel); *Clements v. JPMorgan Chase Bank,*
 24 *N.A.*, No. 12-cv-02179-JCS (J. Spero), recently settled for \$22.25 million common fund in lender-
 25 placed flood insurance case; and *Guerrero v. Wells Fargo*, No. 12-CV-4026-WHA (J. Alsup),
 26 recently settled and returning a 130% recovery of best-case scenario damages to class members).

- 1 • **Christopher A. O'Hara** (Rate: \$575/hr; \$10,063 in total fees charged to this case):

2 27. Christopher O'Hara is a partner at Hagens Berman Sobol Shapiro LLP where he has
3 worked since 1997. He practiced for nearly five years in the firm's Phoenix office before returning
4 to the Seattle office, where he currently concentrates on antitrust, consumer, tax and securities class
5 actions.

6 28. Mr. O'Hara serves as plaintiffs' counsel in Hotel Occupancy Tax litigation against
7 major online travel companies in various jurisdictions across the country. Mr. O'Hara also worked
8 on related litigation against Expedia on behalf of a nationwide class of consumers who purchased
9 hotel reservations and paid excessive "taxes and fees" charges. That case resulted in summary
10 judgment in plaintiffs' favor and an eventual settlement for cash and credits totaling \$134 million.
11 Mr. O'Hara has also worked on a variety of price-fixing cases including actions against the
12 hydrogen peroxide, linerboard and laminate industries.

13 29. An active member of the firm's Microsoft defense team, he negotiates claims
14 administration policy and processing rules on behalf of Microsoft in 20 consumer and antitrust
15 class action state settlements around the country. Building on that experience, Mr. O'Hara
16 currently plays a leading role for the firm in working with claims administrators on all of the firm's
17 class settlements and class notice programs.

18 30. While in Phoenix, Mr. O'Hara deposed more than a dozen of big tobacco's expert
19 witnesses, research scientists and marketing executives for the Tobacco Litigation, focusing
20 predominantly on the Arizona case. He coordinated Arizona's national and local expert witnesses,
21 while contributing to all aspects of discovery and motion practice. Mr. O'Hara played a leading
22 role in the firm's successful defense of the State of Arizona against claims brought by several
23 Arizona counties in the aftermath of the State's Tobacco Litigation.

- 24 • **Rob Haegele** (Rate: \$170/hr; \$20,273 total fees charged to this case):

25 31. Mr. Haegele is a senior paralegal at Hagens Berman Sobol Shapiro. Mr. Haegele has
26 over 20 years of litigation paralegal experience. His rate has been approved on multiple occasions
27 by courts in the Bay Area and throughout the United States.

- **Larry Kunzler** (Rate: \$170/hr; \$101,575 total fees charged to this case):

32. Mr. Kunzler is an investigator at Hagens Berman Sobol Shapiro LLP, where he has worked since 1999. Mr. Kunzler has over 20 years of experience as a legal investigator. In this case, Mr. Kunzler spent hundreds of hours contacting and communicating with Class members and other Aurora customers throughout the United States who believed they were treated unfairly by Aurora.

33. In my judgment, and based on my years of experience, the number of hours expended and the services performed by the attorneys and paraprofessionals at my firm were reasonable and expended for the benefit of Plaintiff and the Class in this litigation. **However, in light of the possibility of duplication of effort due to four law firms working on this case (even though I have seen no indications of duplication), Class Counsel has decided to reduce each firm’s lodestar by 20% for purposes of determining the reasonableness of Class Counsel’s fee request. As a result, for purposes of the lodestar cross-check of the 30% fee sought, Hagens Berman has reduced its lodestar to \$883,730.**

34. The total lodestar of all four firms constituting Class Counsel, reduced by 20% in light of the possibility of duplication of effort among the four firms, is as follows:

	Rate Range	Hours	Lodestar
Hagens Berman	\$170-\$900	2,228	\$883,730
Andrew Oldham	\$150 - \$550	1,766	\$689,288
Abtahi Thigpen	\$375 - \$550	1,639	\$563,070
Richardson Patrick Westbrook & Brickman	\$120 - \$600	920	\$274,695
Total		6,553	\$2,410,783

35. Hagens Berman incurred expenses in the amount of \$170,263, as of October 31, 2014. The largest single expense in this case was the cost to store and present for review the over *eight million pages* of ESI that Aurora produced in this case. In fact, ESI billings alone totaled in excess of \$144,000. Other expenses on this matter include deposition transcripts, filing fees, facsimile and copying charges, computer research, federal express and other delivery charges, travel expenses, and other case-related expenses that commonly benefitted Plaintiffs and the Class.

1 Based on my knowledge and experience, all of these expenses were necessary and reasonable, and
 2 incurred for the benefit of Plaintiffs and the Class in this litigation. At the Court's request, Hagens
 3 Berman can provide a detailed report itemizing each expense item charged to the case. The
 4 following table sets forth Hagens Berman's expenses by category:

5	Expert Fees	\$5,153
6	Travel, etc.	\$5,665
7	Copies, postage, etc.	\$2,177
8	Legal Research	\$2,190
9	Court Filings/Service	\$4,501
10	ESI/Discovery	\$150,579
11	Total	\$170,263

12 36. The total expenses of all four firms constituting Class Counsel are as follows:

13	Hagens Berman	\$170,263
14	Andrew Oldham	\$5,635
15	Abtahi Thigpen	\$1,741
16	RPWB	\$8,244
17	Total	\$185,883

18 37. The Claims Administrator, Gilardi & Co., has agreed to perform the services
 19 necessary in this case for a fee capped at \$85,000. Based upon Hagens Berman's extensive
 20 experience in Class Actions and Class Action settlement distributions, Gilardi & Co.'s fees in this
 21 case are reasonable and are appropriate. In consultation with my Partners, I believe that Hagens
 22 Berman could not perform these same services in house for less than the amount agreed to by
 23 Gilardi & Co.
 24

25 38. To date, Class Counsel have responded to dozens of telephone and email questions
 26 from notice recipients to assist them in understanding their options in response to the Class Notice
 27

1 39. As of the date of this filing, no objections to the Settlement Agreement have been
2 received from Class members, and thus no objections to the requested 30% fee or proposed Class
3 representative service awards. Attached as Exhibit B is a true and correct version of the case report
4 from Gilardi & Co. as of November 12, 2014.

5 I declare under penalty of perjury that the foregoing is true and correct.

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7 Dated: November 14, 2014

/s/Thomas E. Loeser

Thomas E. Loeser

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Exhibit A

HAGENS BERMAN'S LODESTAR

Biller	Position	Fact Research		Discovery		Hearing Prep/Attend		Legal Briefing		Mediation/Settlement		Notice/Claims Admin		Total	
		Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount
S. Berman	Man. Partner	0	\$ -	0.5	\$ 450	1	\$ 900	4.5	\$ 4,050	1	\$ 900	0	\$ -	7	\$ 6,300
C. O'Hara	Partner	0	\$ -	0	\$ -	0	\$ -	0	\$ -	2	\$ 1,150	15.5	\$ 8,913	17.5	\$ 10,063
T. Loeser	Partner	42.9	\$ 27,885	664.35	\$ 431,828	17.3	\$ 11,245	582.7	\$ 378,755	144.7	\$ 94,055	34.9	\$ 22,685	1486.85	\$ 966,453
R. Haegele	Paralegal	0.4	\$ 68	27.2	\$ 4,624	1.5	\$ 255	88.15	\$ 14,986	2	\$ 340	0	\$ -	119.25	\$ 20,273
L. Kunzler	Investigator	595.6	\$ 101,252	0	\$ -	0	\$ -	1.9	\$ 323	0	\$ -	0	\$ -	597.5	\$ 101,575
Grand Total		638.9	\$ 129,205	692.05	\$ 436,902	19.8	\$ 12,400	677.25	\$ 398,114	149.7	\$ 96,445	50.4	\$ 31,598	2228.1	\$ 1,104,663

Exhibit B

Weekly Statistic Report

November 12, 2014

Mailing Date: 10/15/2014
 Opt-Out Deadline: 12/15/2014
 Objection Deadline: 12/15/2014



CASE MANAGER: Kenneth Jue
 Direct Telephone: (415) 458-3045
 Email: Kenneth.Jue@Gilardi.com

Asst. Case Manager: Scott Dicarlo
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PLAINTIFFS' COUNSEL
 Thomas A. Loeser
Hagens Berman Sobol Shapiro LLP

Ali Abtahi
Abtahi Law Firm

Andrew Oldham
Law Office of Andrew Oldham

T. Christopher Tuck
Richardson, Patrick, Westbrook & Brickman LLC

DEFENSE COUNSEL
 David B. Bergman
 Ian S. Hoffman
ARNOLD & PORTER LLP

Week of	Postcards Mailed	DISPUTES RECEIVED		OPT-OUTS RECEIVED		OBJECTIONS RECEIVED		RETURNED UNDELIVERABLE MAIL			Emails Received	Calls Received
		Timely disputes	Late disputes	Timely exclusions	Late exclusions	Timely objections	Late objections	RUM ¹	Searched	Remailed		
10/15/2014	15,135	-	-	-	-	-	-	-	-	-	-	-
10/22/2014	-	6	-	0	0	0	-	0	0	0	39	208
10/30/2014	-	40	-	0	-	0	-	1,187	1,187	1,015	13	64
11/6/2014	-	52	-	2	-	0	-	648	648	531	1	54
11/12/2014	-	0	-	2	-	0	-	118	118	115	12	19
Total:	15,135	98	0	4	0	0	0	1,953	1,953	1,661	65	345

NOTES: ¹RUM is an acronym for Returned Undeliverable Mail, indicating mail returned by the United States Postal Service (USPS).

The numbers and statistics are for your reference only and will change throughout the administration process. Final numbers and statistics shall be provided by the Case Manager once response deadlines have passed and all responses have been properly validated.