

KAZEROUNI LAW GROUP, APC
245 FISHER 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

HYDE & SWIGART

Joshua B. Swigart, Esq. (225557)

josh@westcoastlitigation.com

2221 Camino Del Rio South, Ste. 101

San Diego, CA 92108

Telephone: (619) 233-7770

Facsimile: (619) 297-1022

Attorneys for Plaintiff,

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

**HEATHER MAXIN,
INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS
SIMILARLY SITUATED,**

Plaintiff,

v.

RHG & COMPANY, INC.,

Defendant.

Case No.: 16-cv-2625-JLS-BLM

**DECLARATION OF CLARK
OVRUCHESKY, ESQ. IN SUPPORT
OF COUNSEL'S HOURLY RATES**

DATE: February 15, 2018

TIME: 1:30 p.m.

COURTROOM: 4D

HON. JANIS L. SAMMARTINO

///

///

///

///

///

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

1 I, CLARK OVRUCHESKY, declare under penalty of perjury, as provided for by
2 the laws of the United States, 28 U.S.C. § 1746, as well as the laws of the State of
3 California that the following statements are true:

- 4 1. I regularly practice before the District Courts of California and am familiar
5 with the hourly rates charged by attorneys who practice in these Courts,
6 including the Southern District of California.
- 7 2. A large part of my practice focuses on consumer related issues and litigation.
8 These cases include both individual actions as well as complex class actions.
- 9 3. The hourly rate in the Southern District of California for an attorney with
10 Joshua B. Swigart's experience and expertise in consumer litigation would be
11 in the range of \$625.00 per hour for this type of litigation. Therefore, \$625.00
12 per hour would be a reasonable and appropriate hourly rate for Mr. Swigart.
- 13 4. The hourly rate in the Southern District of California for an attorney with
14 Abbas Kazerounian's experience and expertise in consumer litigation would
15 be in the range of \$625.00 per hour for this type of litigation. Therefore,
16 \$625.00 per hour would be a reasonable and appropriate hourly rate for Mr.
17 Kazerounian.
- 18 5. The hourly rate in the Southern District of California for an attorney with
19 Matthew M. Loker's experience and expertise in consumer litigation would be
20 in the range of \$495.00 per hour for this type of litigation. Therefore, \$495.00
21 per hour would be a reasonable and appropriate hourly rate for Mr. Loker.
22
23
24
25
26
27
28

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

6. I have known each of these attorneys for several years, and I am familiar with their legal work, as we have similar consumer law practices and both practice in the District Courts of California.

I declare under the penalty and perjury under the laws of the United States of America as well as the State of California, that the foregoing is true and correct.

Date: November 10, 2017

BY: /s/ Clark Ovruchesky
CLARK OVRUCHESKY, ESQ.