

KAZEROUNI LAW GROUP, APC
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KAZEROUNI LAW GROUP, APC

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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 WAYNE A.
SINNETT, ESQ. IN SUPPORT OF
COUNSEL'S HOURLY RATES**

DATE: February 15, 2018

TIME: 1:30 p.m.

COURTROOM: 4D

HON. JANIS L. SAMMARTINO

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1 I, WAYNE A. SINNETT, declare under penalty of perjury, as provided for by the
2 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,
12 \$625.00 per hour would be a reasonable and appropriate hourly rate for Mr.
13 Swigart.

14 4. The hourly rate in the Southern District of California for an attorney with
15 Abbas Kazerounian's experience and expertise in consumer litigation would
16 be in the range of \$625.00 per hour for this type of litigation. Therefore,
17 \$625.00 per hour would be a reasonable and appropriate hourly rate for Mr.
18 Kazerounian.

19 5. The hourly rate in the Southern District of California for an attorney with
20 Matthew M. Loker's experience and expertise in consumer litigation would
21 be in the range of \$495.00 per hour for this type of litigation. Therefore,
22 \$495.00 per hour would be a reasonable and appropriate hourly rate for Mr.
23 Loker.

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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/ Wayne A. Sinnett
WAYNE A. SINNETT, ESQ.