

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

4
5 I declare under the penalty and perjury under the laws of the United States
6 of America as well as the State of California, that the foregoing is true and correct.

7
8 Date: November 11, 2017

BY: /s/ Schuyler Hoffman
SCHUYLER HOFFMAN, ESQ.

9
10 **SIGNATURE CERTIFICATION**

11 Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies
12 and Procedures Manual, I hereby certify that the content of this document is
13 acceptable to Mr. Hoffman, and that I have obtained Mr. Hoffman's authorization
14 to affix Mr. Hoffman's electronic signature to this document.

15 Dated: November 11, 2017

Respectfully submitted,

16 **KAZEROUNI LAW GROUP, APC**

17
18 By: /s/ Abbas Kazerounian
19 ABBAS KAZEROUNIAN, ESQ.
20 ATTORNEY FOR PLAINTIFF