

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 NICHOLAS J.  
BONTRAGER, 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, NICHOLAS J. BONTRAGER, declare under penalty of perjury, as provided for  
2 by the laws of the United States, 28 U.S.C. § 1746, as well as the laws of the State  
3 of 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.  
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1 6. I have known each of these attorneys for several years, and I am familiar with  
2 their legal work, as we have similar consumer law practices and both practice  
3 in the District Courts of California.  
4

5 I declare under the penalty and perjury under the laws of the United States of  
6 America as well as the State of California, that the foregoing is true and correct.  
7

8 Date: November 13, 2017

BY: /s/ Nicholas J. Bontrager  
NICHOLAS J. BONTRAGER, ESQ.

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. Bontrager, and that I have obtained Mr. Bontrager's authorization  
14 to affix Mr. Bontrager's electronic signature to this document.

15 Dated: November 13, 2017

Respectfully submitted,

17 **KAZEROUNI LAW GROUP, APC**

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