

EXHIBIT 20

KAZEROUNI LAW GROUP, APC

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Submitted on Behalf of:

Kazerouni Law Group, APC

Counsel for Plaintiff(s) in:

Bayard, Leslie, and Medina, Nomer v. Hyundai and Kia

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

IN RE: HYUNDAI AND KIA FUEL
ECONOMY LITIGATION

Case No. 2:13-ml-02424-GW-FFM

**DECLARATION OF ABBAS
KAZEROUNIAN IN SUPPORT OF
REQUEST FOR ATTORNEYS' FEES
AND EXPENSES**

Date: December 23, 2014

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I, Abbas Kazerounian, declare as follows:

1. I am a partner at Kazerouni Law Group, APC counsel for Leslie Bayard and Nomer Medina. This declaration is submitted in support of the fees and expenses request for work performed by Kazerouni Law Group, APC in connection with this litigation. I have personal knowledge of the facts below and, if called upon to do so, could and would testify competently thereto. This declaration is submitted after a review of the billing records of Kazerouni Law Group, APC.

I. OVERVIEW

A. Overview of Work Performed

2. I was one of Plaintiffs attorneys. I reviewed multiple motions and reports; I also attended numerous conference calls.

B. Requested Lodestar

3. Leslie Bayard and Nomer Medina request a total lodestar of \$7,612.50 dollars, which is based on 14.50 hours, as compensation for their counsel Kazerouni Law Group, APC.

4. Below is a summary of all of the individuals who worked on this matter, their role (Sr. Partner, Jr. Partner, Sr. Associate, Jr. Associate, Litigation Staff), the total number of hours they worked on this matter for which compensation is requested, their hourly billing rate, and their total lodestar.

Attorney	Role	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	Partner	14.50	\$525.00	\$7612.50
TOTALS				\$7,612.50

II. LODESTAR BY TYPE OF WORK

5. The below divides the total lodestar listed above into distinct categories.

1 **A. Time Spent Preparing Complaint(s), Litigating Actions Outside of the**
2 **MDL, Appearing Before the Judicial Panel of Multidistrict Litigation,**
3 **and other Time Before February 14, 2013**

4 6. This category includes all time spent before the initial status conference
5 before Judge Wu, which occurred on February 14, 2013. It also includes any time spent
6 after February 14, 2013, preparing and filing complaints, litigating those cases outside of
7 the MDL proceedings, and appearing before the Judicial Panel on Multidistrict Litigation.

8 7. Below is a list of the attorneys who worked on this portion of the litigation,
9 along with the number of hours each spent, their billing rates, the lodestar attributable to
10 them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	0.50	\$525.00	\$262.50
TOTALS			\$262.50

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16 8. During this time, I reviewed case facts, the initial draft Complaint, and
17 reviewed the First Amended Complaint and Amended Summons. This category includes
18 all hearings with Judge Wu (attended in person or telephonically) in MDL 2424. The
19 first hearing was on February 14, 2013.

20 9. Below is a list of the attorneys who worked on this portion of the litigation,
21 along with the number of hours each spent, their billing rates, the lodestar attributable to
22 them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	1.50	\$525.00	\$787.50
TOTALS			\$787.50

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28 10. I attended a Status Conference with Judge Wu that lasted for 1.50/hours.

1 **B. Calls with Non-Settling Plaintiff Group**

2 11. This category includes calls with the Non-Settling Plaintiffs that were
3 organized by Liaison Counsel.

4 12. Below is a list of the attorneys who worked on this portion of the litigation,
5 along with the number of hours each spent, their billing rates, the lodestar attributable to
6 them, and the total lodestar for this portion of the litigation.

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Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	0.80	\$525.00	\$420.00
TOTALS			\$420.00

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12 13. I attended a Conference Call with Eric Gibbs and other non-settling
13 Plaintiffs attorneys. The Conference Call was 0.80/hours.

14 **C. Review and Discussion of Settlement Terms and Revisions**

15 14. This category includes time spent reviewing and discussing the terms of the
16 proposed settlement, including the following tasks:

- 17
- 18 a. Review of the initial Term Sheet, distributed in February 2013.
 - 19 b. Review of Liaison Counsel’s December 20, 2013 memo, which described
20 how the discovery related to the strengths and weaknesses of plaintiffs’
21 claims.
 - 22 c. Review of the proposed settlement filed December 23, 2013 and the two
23 Addendums, filed January 16, 2014, and May 2, 2014. This includes
24 discussions and correspondence with Non-Settling Plaintiffs regarding
25 the settlement, the settlement negotiations conducted by Liaison Counsel,
26 and the revisions to the settlement. It also includes the review of
27 settlement-related memos and summaries distributed to Non-Settling
28 Plaintiffs after the settlement was filed on December 23, 2013.

1 15. Below is a list of the attorneys who worked on this portion of the litigation,
2 along with the number of hours each spent, their billing rates, the lodestar attributable to
3 them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	0.3	\$525.00	\$157.50
TOTALS			\$157.50

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8 16. During this time, I reviewed and evaluated the Liaison Status Report.

9 17. Below is a list of the attorneys who worked on this portion of the litigation,
10 along with the number of hours each spent, their billing rates, the lodestar attributable to
11 them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	3.10	\$525.00	\$1,627.50
TOTALS			\$1,627.50

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17 18. During this time, I reviewed the Settling Plaintiff's Motion for Class
18 Settlement.

19 19. Below is a list of the attorneys who worked on this portion of the litigation,
20 along with the number of hours each spent, their billing rates, the lodestar attributable to
21 them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	1.00	\$525.00	\$525.00
TOTALS			\$525.00

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27 20. During this time, I evaluated the joint discovery motion.
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21. Below is a list of the attorneys who worked on this portion of the litigation, along with the number of hours each spent, their billing rates, the lodestar attributable to them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	1.00	\$525.00	\$525.00
TOTALS			\$525.00

22. During this time, I read Judge Wu’s order regarding the joint discovery motion.

23. Below is a list of the attorneys who worked on this portion of the litigation, along with the number of hours each spent, their billing rates, the lodestar attributable to them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	2.00	\$525.00	\$1,050.00
TOTALS			\$1,050.00

24. During this time, I evaluated the Settling Plaintiffs’ Motion for Class Certification

25. Below is a list of the attorneys who worked on this portion of the litigation, along with the number of hours each spent, their billing rates, the lodestar attributable to them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	1.30	\$525.00	\$682.50
TOTALS			\$682.50

26. During this time, I participated in a Conference call regarding Settlement of Plaintiffs’ Motions.

27. Below is a list of the attorneys who worked on this portion of the litigation, along with the number of hours each spent, their billing rates, the lodestar attributable to them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	0.10	\$525.00	\$262.50
TOTALS			\$262.50

28. During this time, I evaluated the Liaison Counsel Report.

D. Preparation of Document Requests, Review of Document Production Summaries, and Review of “Hot Document” Databases Provided by Liaison Counsel

29. This category includes time spent preparing, reviewing, and submitting revisions to plaintiffs’ document requests served on May 22, 2013. It also includes review of document production summaries distributed by Liaison Counsel throughout the course of the litigation, as well as documents contained in the online document database that accompanied Liaison Counsel’s summaries in October and December 2013. This does not include work that was specifically assigned by Liaison Counsel, which is captured in section F below.

30. Below is a list of the attorneys who worked on this portion of the litigation, along with the number of hours each spent, their billing rates, the lodestar attributable to them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	1.50	\$525.00	\$787.00
TOTALS			\$787.00

31. During this time, I participated in a conference call regarding discovery, which lasted 1.5 hours.

E. Document Review and Confirmatory Discovery Interviews Assigned by Liaison Counsel

32. This category includes time spent on review of documents posted to the online EasyESI database that was specifically assigned by Liaison Counsel. It does not include time spent performing other types of document review, such as reviewing document summaries or compilations of “hot documents” that Liaison Counsel distributed to Non-Settling Plaintiffs, which is captured in section E above.

33. This category also includes time spent on smaller group calls and correspondence specifically regarding the document review. This time should be listed here, instead of in section C above. For example, it includes the time document reviewers spent providing information to the counsel conducting the interviews or to Liaison Counsel for the preparation of document summary reports.

34. Below is a list of the attorneys who worked on this portion of the litigation, along with the number of hours each spent, their billing rates, the lodestar attributable to them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	1.00	\$525.00	\$525.00
TOTALS			\$525.00

35. During this time, two Status Conference calls were held regarding discovery, which lasted .50/hours each.

F. Discovery-Related Motion Practice and Meet and Confer

36. This category only applies to those plaintiffs and firms that raised additional discovery issues in October and November 2013. This includes time spent meeting and conferring on those issues and, if applicable, preparing portions of the joint discovery stipulation filed in November 2013. It also includes subsequent efforts to resolve discovery disputes.

37. Below is a list of the attorneys who worked on this portion of the litigation, along with the number of hours each spent, their billing rates, the lodestar attributable to them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	0.20	\$525.00	\$105.00
TOTALS			\$105.00

38. During this time, I participated in a conference call to meet and confer regarding the Joint Status Conference Statement.

G. Other

39. This category includes any hours not included in the above categories for which attorneys' fees are sought.

40. Below is a list of the attorneys who worked on this portion of the litigation, along with the number of hours each spent, their billing rates, the lodestar attributable to them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Abbas Kazerounian	0.20	\$525.00	\$105.00
TOTALS			\$105.00

41. During this time, I evaluated, approved and/or conferred with Defendants regarding the Confidentiality Agreement.

1 **III. LITIGATION EXPENSES**

Expense Category	Amount
N/A	N/A

8 **IV. THE REQUESTED HOURLY RATES ARE REASONABLE**

9 42. To determine a reasonable hourly rate for this matter, I previously consulted
10 a primary source, the Laffey Matrix issued by the United States Department of Justice.
11 According to the Laffey Matrix, an attorney with 8-10 years of experience should be
12 entitled to a reasonable hourly rate of \$567/hour in 2013-2014. I have over eight years of
13 experience as a federal litigator, having graduated from law school in 2006. I am one of
14 the founding partners at Kazerouni Law Group, APC. I am one of the most predominant
15 FDCPA and RFDCPA practitioners in California. I have litigated over 1000 individual
16 consumer rights cases. The depth of my experience and my knowledge in this practice
17 area along with my trial skills make me one of the most premiere advocates within this
18 field of law. In light of the foregoing, I have adopted a reasonable hourly rate for
19 services in this matter of \$525/hour.

21 I declare under penalty of perjury under the laws of the United States of America
22 that the foregoing is true and correct. Executed December 23, 2014, at Costa Mesa,
23 California.

25 **KAZEROUNI LAW GROUP, APC**

26 By: /s Abbas Kazerounian