

EXHIBIT 1

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7 Submitted on Behalf of:
8 **Ahdoot & Wolfson, PC**

9 Counsel for Plaintiff(s) in:
10 *Laura S. Sutta, et al. v. Hyundai Motor America, Case No. 8:13-cv-00417*

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

13
14 IN RE: HYUNDAI AND KIA FUEL
15 ECONOMY LITIGATION

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

16 **DECLARATION OF ROBERT R.**
17 **AHDOOT IN SUPPORT OF**
18 **REQUEST FOR ATTORNEYS' FEES**
19 **AND EXPENSES**

20 Hearing Date: February 26, 2014

1 I, Robert R. Ahdoot, declare as follows:

2 1. I am a partner at Ahdoot & Wolfson, PC, counsel for Plaintiffs, Laura S.
3 Sutta and Jeffrey Hathaway. This declaration is submitted in support of the fees and
4 expenses request for work performed by Ahdoot & Wolfson, PC in connection with this
5 litigation. I have personal knowledge of the facts below and, if called upon to do so,
6 could and would testify competently thereto. This declaration is submitted after a review
7 of the billing records of Ahdoot & Wolfson, PC.

8 2. With the assistance of the mediator, The Honorable Steven J. Sundvold
9 (Ret.), Ahdoot & Wolfson, PC has agreed to accept the total amount of \$5,000 for the
10 lodestar of \$22,644.50 described herein. Thus, Ahdoot & Wolfson seeks only \$5,000 in
11 fees.

12 **I. OVERVIEW**

13 **A. Overview of Work Performed**

14 3. Ahdoot & Wolfson conduct significant investigation and research prior to
15 the filing of the complaint filed on behalf of its clients, and in the drafting of the
16 complaint. Following the announcement of the early Settlement, Ahdoot & Wolfson
17 worked with liaison counsel and one of the coalitions of the Non-Settling Plaintiffs in
18 order to ensure a fair settlement. Ahdoot & Wolfson worked efficiently with co-counsel
19 to minimize duplication of efforts, and following the settlement, expended work only to
20 ensure that the settlement ultimately approved by the class is fair, reasonable and
21 adequate.

22 **B. The Lodestar**

23 4. Plaintiffs, Laura Sutta and Jeffrey Hathaway, request a total lodestar of
24 \$22,644.50, which is based on 45.1 hours, as compensation for their counsel at Ahdoot &
25 Wolfson. Ahdoot & Wolfson's billing rates are in accord with the Laffey Matrix
26 (<http://www.laffeymatrix.com/see.html> (last visited July 15, 2014)).

27 5. Below is a summary of all of the individuals who worked on this matter,
28 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
Robert R. Ahdoot	Sr. Partner	20.7	\$695	\$14,386.50
Tina Wolfson	Sr. Partner	1.2	\$695	\$834
Bradley King	Associate	23.2	\$320	\$7,424
TOTALS		45.1		\$22,644.50

II. LODESTAR BY TYPE OF WORK

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

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

7. This category includes all time spent before the initial status conference before Judge Wu, which occurred on February 14, 2013.

8. 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
Robert R. Ahdoot	11.6	\$695	\$8,062
Tina Wolfson	1.2	\$695	\$834
Brad King	19.8	\$320	\$6,336
TOTALS		32.6	\$15,232

9. In January 2013, Plaintiffs, Sutta and Hathaway, commenced their litigation against Hyundai. Prior to filing, Ahdoot & Wolfson conducted extensive investigation of the representations made regarding the mileage on their client’s vehicle and analyzed the veracity of these claims. Ahdoot & Wolfson also researched Defendant’s statements in

1 the media regarding the vehicles, business practices, and interviewed several individuals
 2 affected by the misrepresentations regarding the mileage of the effected vehicles. Ahdoot
 3 & Wolfson worked with co-counsel at the firm of Glancy, Binkow and Goldberg, LLP to
 4 research applicable law and causes of action and to draft a complaint. Following the
 5 filing of the complaint, Ahdoot & Wolfson followed the litigation and MDL proceedings,
 6 and attempted to work with the various plaintiffs’ counsel appearing at the MDL, until
 7 the Settlement was announced.

8 **B. Calls / Communication with Non-Settling Plaintiff Group**

9 10. This category includes calls with the Non-Settling Plaintiffs that were
 10 organized by Liaison Counsel.

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

Attorney	Total Hours	Billing Rate	Lodestar
Robert R. Ahdoot	1.5	\$695	\$1,042.50
Brad King	.6	\$320	192
TOTALS	2.1		\$1,234.50

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 20 12. These hours reflect time spent on various calls and communication with
 21 Liaison counsel regarding the Plaintiffs’ position on the proposed settlement.

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

23 13. This category includes time spent reviewing and discussing the terms of the
 24 proposed settlement, including the following tasks:

- a. Review of the proposed settlement filed December 23, 2013 and the two Addendums, filed January 16, 2014, and May 2, 2014. This includes discussions and correspondence with Non-Settling Plaintiffs and co-counsel, regarding the settlement, other than the phone calls described

above. It also includes the review of settlement-related memos and summaries distributed to Non-Settling Plaintiffs, or served on the Plaintiffs by the Settling Plaintiffs, after the settlement was filed on December 23, 2013.

b. Time spent preparing position statements for Liaison Counsel’s Reports.

14. 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
Robert R. Ahdoot	7.6	\$695	\$5,282
Brad King	2.8	\$320	\$896
TOTALS	10.4		\$6,178

III. THE REQUESTED HOURLY RATES ARE REASONABLE

15. As stated, Ahdoot & Wolfson’s hourly rates are in accord with the Laffey Matrix and have been approved by various courts in awarding attorneys fees pursuant to class action settlements.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 19, 2014, at Los Angeles, California.

