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Attorneys for Plaintiffs Staci Chester, etc.

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15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17 EASTERN DIVISION
18

19 STACI CHESTER, et al.,
20 Plaintiffs,

21 vs.

22 THE TJX COMPANIES, INC., et al.,
23 Defendants.
24

Case No. 5:15-cv-01437-DDP-DTBx

CLASS ACTION

**DECLARATION OF MICHAEL G.
DAWSON IN SUPPORT OF
MOTION FOR ATTORNEYS' FEES
AND LITIGATION COSTS**

DECLARATION OF MICHAEL G. DAWSON

I, Michael G. Dawson, declare:

1. I am an attorney at law duly licensed to practice before the United States District Court for the Central District of California; and all State courts in California. I was employed as an associate attorney at The Law Offices of Herbert Hafif, P.C., co-counsel of record for Plaintiffs Staci Chester, Robin Berkoff, Theresa Metoyer, and Daniel Friedman. I make this declaration in support of Plaintiffs' Motion for Attorneys' Fees, Litigation Costs and Class Representatives' Enhancement Payments. If called as a witness to any proceeding, I would competently testify to the following facts, which are within my own personal knowledge.

EDUCATION AND EXPERIENCE

2. I pursued my undergraduate education at the University of Southern California, and received a Bachelors of Science Degree in Business Administration in 1986. I received my legal education at Pepperdine University School of Law receiving my Juris Doctorate in 1990, graduating cum laude. I was a Literary and Citation 8 Editor of the Law Review, and had two articles published in the Law Review.

3. I have been employed at the Law Offices of Herbert Hafif, P.C., ("LOHH") since 1992. Since that time, I have been involved in a variety of complex litigation matters, including but not limited to antitrust, false claims act, intellectual property, personal injury and wrongful death, employment discrimination, and wrongful discharge. LOHH is a firm that is very experienced in class action litigation and has been involved in the following collective action and class action matters:

- a. *Lukens v. The Ohio States Life Ins.*, Los Angeles County Superior Court, Case Number BC 263545;
- b. *Sueoka v. United States*, United States District Court, Central District of California, Case Number 939-6313 MM (Rex);

- 1 c. *Richard S. v. Dept. of Development Services of the State of*
2 *California*, United States District Court, Central District, Southern
3 Division, Case Number SACV97-219 (GLT);
4 d. *Saeger, et al. v. Pacific Life Insurance Company, et al.*, United
5 States District Court, Southern District of California, Case
6 Number SA02-314 AHS (.MLGx);
7 e. *Simon v. Walt Disney World Co.*, Superior Court, California,
8 County of Fresno, Case Number 594786-6;
9 f. *Reed v. County of Orange*, United States District Court, Central
10 District of California, District Case Number SACV05-1103 CJC
11 (ANx);
12 g. *Alaniz v. City of Los Angeles*, United States District Court, Central
13 District of California, Case Number CV 04-8592 GAF (JWJx);
14 h. *Nolan v. City of Los Angeles*, United States District Court, Central
15 District of California, Case Number CV03-2190 GAF (JWJx);
16 i. *Carrera v. Balley Fitness Corp.*, Superior Court, County of Los
17 Angeles, Case Number BC 345316.
18 j. *Berkoff v. Masai USA Corp, d/b/a MBT Masai USA Corp., et al.*,
19 United States District Court, Central District of California, Case
20 Number EDCVI 0-00969 V AP (OPx);
21 k. *Stalker v. Skechers U.S.A., Inc., et al.*, United States District Court,
22 Central District of California, Case Number CV1 0-05460 JAK
23 (JEMx).
24 l. *Martin v. Balboa Thrift and Loan Association et al.*, San Diego
25 Superior Court, Case No. 37-2012-00077569-CU-BT-SC;
26 m. *Ramirez v. Balboa Thrift and Loan*, San Diego Superior Court,
27 Case No. 37-2009-00099225-CU-BT-CTL.

28 4. I was personally been involved in litigating the *Reed, Nolan, Mata, Alaniz,*

1 *Lukens, Sueoka, Richard S., Saeger, Simon, Carrera, and Balboa Thrift and Loan*
2 *cases.*

3 5. Along with co-counsel, LOHH has zealously prosecuted this action on
4 behalf of the Plaintiffs and all of the putative class members.

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6 **Reasonableness of Time Spent and Fees Requested**

7 6. I have reviewed all of my billing entries in this case and have verified
8 that each one accurately reflects the work I performed on that particular task.

9 7. I believe that based upon my over twenty-seven (27) years of experience as a
10 lawyer my suggested rate of \$600 is certainly reasonable, given my qualifications,
11 and experience employment litigation, as well as antitrust, false claims act,
12 intellectual property, personal injury and wrongful death, and wrongful discharge.

13 8. Judge Fees also approved my rate of \$450.00 in the matter of *Nolan v. City*
14 *of Los Angeles*, United States District Court, Central District of California, Case
15 Number CV03-2190 GAF (JWJx) [Dkt No. 1063].


16 9. Similarly, Judge King also approved my rate of \$450.00 in the matter of
17 *Acevado v. City of Los Angeles*, United States District Court, Central District of
18 California, Case Number CV 14-5661-GHK (PJWx) [Dkt No. 118].

19 11. I expended a total of **35 hours** between approximately April 22, 2017 to
20 May 19, 2017. My work consisted of assisting plaintiffs' co-counsel with opposing
21 the defendants' then pending motion for summary judgment. I prepared the response
22 to the defendants' separate statement of undisputed material facts, an argument for
23 the brief concerning the lack of impact of subsequent purchases, a summary of
24 defendants' arguments in its' motion for summary judgment, objections to
25 defendants' evidence filed in support of the motion for summary judgment, and
26 research in support of the opposition to motion for summary judgment. Thus, based
27 on an hourly rate of \$600 per hour, I incurred **\$21,000** in attorney's fees in this case.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on March 8, 2018, at Claremont, California.


Michael G. Dawson