

**KAZEROUNI LAW GROUP, APC**

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**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF KERN – UNLIMITED**

**FREDERICK C. ANDERSON,  
INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,**

Plaintiff,

v.

**PHOENIX FINANCIAL  
SERVICES, LLC; AND,  
PENDRICK CAPITAL PARTNERS  
II, LLC,**

Defendants.

**Case No.:** BCV-16-101385

**DECLARATION OF MICHAEL F.  
CARDOZA IN SUPPORT OF  
PLAINTIFF FREDERICK C.  
ANDERSON'S MOTION FOR  
ATTORNEYS' FEES AND COSTS**

**DATE:** July 23, 2018

**TIME:** 8:30 A.M.

**DEPT:** 2

**HON. STEPHEN D. SCHUETT**

**RESERVATION ID #: 29456**

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1 I, MICHAEL F. CARDOZA, declare as follows:

- 2 1. I am one of the attorneys for Plaintiff in this action.
- 3 2. I am over the age of 18 and am fully competent to make this declaration.
- 4 3. I am a member in good standing of the bar of the State of California.
- 5 4. I have litigated cases in both state and federal courts in California, and in
- 6 Military Courts-Martial.
- 7 5. If called as a witness, I would competently testify to the matters herein from
- 8 personal knowledge.
- 9 6. The declaration is based upon my personal knowledge, except where
- 10 expressly noted otherwise.
- 11 7. I submit this declaration in support of the Plaintiff's motion for fees and costs.
- 12 8. The hours I have incurred herein are documented in my time sheet.

13 **EXPERIENCE OF MICHAEL F. CARDOZA**

- 14 9. I graduated from the Georgetown University Law Center in 1997 and was
- 15 admitted to the State Bar of California in 1998.
- 16 10. I was formally trained as a Consumer Protection Attorney, inter alia, at the
- 17 Naval Justice School located the Naval Station Newport, Newport, Rhode
- 18 Island from which I graduated in 1998.
- 19 11. Upon assignment to U.S. Marine Corps Forces, Japan, in 1999, I served as,
- 20 inter-alia, a military legal assistance attorney and advised clients regarding
- 21 Consumer Protection Law, in particular, that relating to the collection of
- 22 debts, reporting of consumer information to consumer reporting agencies, and
- 23 the protections afforded military active duty and reserve personnel under
- 24 federal law.
- 25 12. From 2000 to 2002, I served consecutively as a military criminal defense
- 26 attorney and military prosecutor at Marine Corps Base, Camp Pendleton,
- 27

1 California and litigated hundreds of criminal cases to include contested bench  
2 and jury trials.

3 13. From 2002 to 2006, while serving in primarily Military General Counsel roles,  
4 I regularly advised individual military servicemembers about Consumer  
5 Protection Law.

6 14. From 2007 until 2014 I was the Chief Operating Officer and Corporate  
7 Counsel responsible for designing, establishing, auditing and maintaining  
8 Consumer Protection Law compliance (FDCPA, FCRA, TCPA, etc.) for a  
9 large regional consumer collection law firm and a privately held distressed  
10 consumer receivables acquisition and recovery company. In this role I advised  
11 on corporate Consumer Protection litigation decisions and managed outside  
12 counsel.

13 15. From 2014 to the present, I have exclusively represented consumers in  
14 litigation, primarily in the areas of Fair Debt Collection Practices Act and Fair  
15 Credit Reporting Act claims, claims under analogous California statutes, and  
16 class action litigation of the same.

17 16. The hourly rate that I am seeking in this action is \$525, which I believe is  
18 reasonable.

19 17. I have filed and litigated consumer class actions over the last several years,  
20 including the following, which I am or have been personally involved in:

21 a. *Evans, et al. v. GAP, Inc.* RG17876207 (Sup. Ct. Alameda) (Consumer's  
22 Legal Remedies Act class action filed on September 21, 2017);

23 b. *Calderon, et al. v. The Wolf Firm*, 16-CV-1266-JLS-KES (C.D. Cal.)  
24 (California class action settlement under FDCPA and RFDCPA, for claims  
25 of wrongful debt collection. Order conditionally granting Plaintiff's  
26 unopposed motion for preliminary approval granted in March 13, 2018);  
27

1 c. *Anderson v. Phoenix Financial Services, LLC, et al.*, BCV-16-101385  
2 (Sup. Ct. Kern) (FDCPA class action preliminarily approved on February  
3 20, 2018).

4 **ADDITIONAL RELEVANT PUBLICATIONS, EDUCATION, AWARDS, ASSOCIATIONS,**  
5 **AND TRAINING**

6 18. I am the author of “*The Secret World of Debt Collection: Beat Collectors at*  
7 *Their Own Game – A Former Collections Executive Reveals How*” (1<sup>st</sup> ed.  
8 2015)

9 19. I have appeared on San Francisco’s KGO Radio AM 810 with Michael  
10 Finney, KDOW Radio AM 1220, Ocean 98 Morning (Radio) Show, and with  
11 Cyrus Webb on Conversations Live Radio – all to discuss Consumer  
12 Protection Law and, in particular, consumer debt collection and credit  
13 reporting.

14 20. I have received over five days of training in winning Consumer Protection  
15 Law cases per year every year since 2014.

16 21. I have been an invited speaker on Consumer Protection Law at the American  
17 Bar Association’s Legal Assistance in the Military Program for 2018.

18 22. I have been an invited speaker on Consumer Protection Law, specifically,  
19 consumer debt collection and credit reporting, at Marine Corps Base Camp  
20 Pendleton’s Continuing Legal Education for Military Attorneys in 2017 and  
21 2018.

22 23. I have been an invited speaker on Consumer Protection Law at the National  
23 Association of Consumer Attorneys’ seminar on the Servicemember’s Civil  
24 Relief Act in 2018.

25 24. I am an active member of the National Association of Consumer Attorneys.

26 25. I hold an Avvo rating as a “Top Consumer Protection Attorney” of 10 (out of  
27 a possible 10).



# PLAINTIFF'S EXHIBIT C

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In The Case Of

*Frederick C. Anderson, Individually and on Behalf of All Others Similarly  
Situated,*

v.

*Phoenix Financial Services, LLC; and, Pendrick Capital Partners II, LLC,*

**BCV-16-101385**

KAZEROUNI LAW GROUP, APC  
245 FISCHER AVENUE, UNIT D1  
COSTA MESA, CA 92626  
(800) 400-6808



# INVOICE

Date: 03/21/2018  
Due On: 04/20/2018

## The Cardoza Law Corporation

548 Market St # 80594  
San Francisco, California 94104  
United States

Mr. Fred Anderson

**00023-Anderson**

**v. Phoenix Financial Services RFDCPA**

### Services

Type	Date	Description	Quantity	Rate	Total
Service	11/23/2015	Client Interview	0.50	\$525.00	\$262.50
Service	02/20/2016	Rule 11 Investigation	2.00	\$525.00	\$1,050.00
Service	04/29/2016	Research and Investigation	0.37	\$525.00	\$192.06
Service	06/09/2016	Client Communications: Draft of class rep duties and obligations	1.20	\$525.00	\$630.00
Service	09/13/2016	Filing & Service	0.20	\$175.00	\$35.00
Service	03/10/2017	Client Communications	0.25	\$525.00	\$131.25
Service	03/13/2017	Client Communications	0.55	\$525.00	\$286.85
Service	03/15/2017	Court/Mediation Appearance: Mediation participation	4.00	\$525.00	\$2,100.00
Service	02/05/2018	Review of Pleadings: SA	0.50	\$525.00	\$262.50
Service	03/20/2018	Drafting of Pleadings: Declaration of hourly rate for fee petition	1.48	\$525.00	\$774.67

**Quantity Subtotal 11.04**

**Services Subtotal \$5,724.83**

### Expenses

Type	Date	Description	Quantity	Rate	Total
Expense	03/15/2017	Mileage to/from mediation 84x53.5cents	1.00	\$44.94	\$44.94
Expense	03/15/2017	parking at mediation	1.00	\$33.00	\$33.00
<b>Expenses Subtotal</b>					<b>\$77.94</b>
<b>Quantity Total</b>					<b>11.04</b>
<b>Subtotal</b>					<b>\$5,802.77</b>
<b>Total</b>					<b>\$5,802.77</b>

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
24	04/20/2018	\$5,802.77	\$0.00	\$5,802.77
<b>Outstanding Balance</b>				<b>\$5,802.77</b>
<b>Total Amount Outstanding</b>				<b>\$5,802.77</b>

Please make all amounts payable to: The Cardoza Law Corporation

Please pay within 30 days.