

KAZEROUNI LAW GROUP, APC
245 FISCHER AVENUE, SUITE D1
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KAZEROUNI LAW GROUP, APC

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Attorneys for Plaintiff,

Jayson Swigart

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**JAYSON SWIGART,
INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS
SIMILARLY SITUATED,**

Plaintiff,

v.

PARCEL PENDING, INC.,

Defendant.

Case No.: 18-cv-2238 BEN (WVG)

**DECLARATION OF ABBAS
KAZEROUNIAN IN SUPPORT OF
MOTION FOR PRELIMINARY OF
APPROVAL OF CLASS ACTION
SETTLEMENT**

DATE: May 28, 2019

TIME: 10:30 a.m.

COURTROOM: 5A

HONORABLE ROGER T. BENITEZ

DECLARATION OF ABBAS KAZEROUNIAN, ESQ.

I, ABBAS KAZEROUNIAN, declare:

1. I am one of the attorneys for the Plaintiff JAYSON SWIGART (“Swigart”) in this action.
2. I have been involved in every aspect of litigation for this Action.
3. I submit this declaration in support of the Motion for Preliminary Approval of the Class Action Settlement in the action against Defendant PARCEL PENDING, INC. (“Parcel Pending”).
4. I am over the age of 18 and am fully competent to make this declaration. I was admitted to the State Bar of California in 2007 and have been a member in good standing ever since that time.
5. I have litigated cases in both state and federal courts in California, Washington, Nevada, Arizona, Arkansas, New York, New Jersey, Colorado, Tennessee, Ohio, Florida, Illinois and Texas. I am admitted in every federal district in California and have handled federal litigation in the federal districts of California.
6. I am also admitted to the state bar of Texas, Illinois, Washington, Michigan, New York, Colorado, District of Columbia, the Ninth Circuit Court of Appeals, the Eighth Circuit Court of Appeals, and the Supreme Court of the United States.
7. If called as a witness, I would competently testify to the matters herein from personal knowledge. The declaration is based upon my personal knowledge, except where expressly noted otherwise.
8. I submit this declaration in support of the Plaintiff’s Motion for Preliminary Approval.

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1 9. I believe that I have and will fairly and adequately represent the interests of the
2 putative class members in this action, and I request to be appointed as Class
3 Counsel in this action.

4 10. I am unaware of any conflict of interest between the Plaintiff and the proposed
5 class members, and between Plaintiff and her attorneys including proposed
6 class counsel.

7 **CLASS COUNSEL’S EXPERIENCE**

8 11. Kazerouni Law Group, APC seeks appointment as one of Class Counsel in this
9 action for settlement purposes.

10 12. Since my admission to the California bar in 2007, I have been engaged
11 exclusively in the area of consumer rights litigation, primarily in the area of fair
12 debt collections, the defense of debt collection lawsuits, and class action
13 litigation under the Telephone Consumer Protection Act, California’s invasion
14 of privacy statutes, under Penal Code § 630 *et seq.*, the CLRA, the UCL and
15 false advertising actions concerning consumer products.

16 13. My firm, Kazerouni Law Group, APC, in which I am a principal, has litigated
17 over 1,500 cases in the past ten years.

18 14. My firm has five offices in Orange County, California; San Luis Obispo,
19 California; Phoenix, Arizona; Las Vegas, Nevada; and Dallas, Texas.

20 15. Kazerouni Law Group, APC has extensive experience in consumer class actions
21 and other complex litigation. My firm has a history of aggressive, successful
22 prosecution of consumer class actions.

23 16. Approximately 95% percent of my practice concerns consumer litigation in
24 general.

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KAZEROUNI LAW GROUP, APC'S
CONSUMER RELATED EXPERIENCE AND RESULTS

17.A brief summary of a non-inclusive list of notable published decisions are as follows:

- a. *Sherman v. Yahoo!, Inc.*, 2014 U.S. Dist. LEXIS 13286; 13-CV-0041-GPC-WVG (S.D. Cal.) (TCPA class action where Defendant's motion for summary judgment was denied holding that a single call or text message with the use of an ATDS may be actionable under the TCPA);
- b. *Olney v. Progressive Casualty Insurance Company*, 13-CV-2058-GPC-NLS, 2014 U.S. Dist. LEXIS 9146 (S.D. Cal.) (Defendant's motion to dismiss or in the alternative to strike the class allegations was denied finding that debt collection calls were not exempt from coverage under the TCPA);
- c. *Iniguez v. The CBE Group, Inc.*, 2013 U.S. Dist. LEXIS 127066 (E.D. Cal.); 13-CV-00843-JAM-AC (The court denied Defendant's motion to dismiss and to strike class allegations holding that the TCPA applies to any call made to a cellular telephone with an ATDS);
- d. *Stemple v. QC Holdings, Inc.*, No. 12-cv-01997-BAS (WVG), 2014 U.S. Dist. LEXIS 125313 (S.D. Cal. Sep. 5, 2014) (order denying defendant's motion for reconsideration of class certification under the TCPA);
- e. *Chen v. Allstate Ins. Co.*, 819 F.3d 1136 (9th Cir. 2016) (order affirming decision finding unaccepted offer of judgment under Fed. R. Civ. P. 68 did not moot the plaintiff's individual TCPA claims).

18.I have filed and litigated numerous consumer class actions over the last several years, including but not limited to the following, which I am or have been personally involved in:

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- a. *Lemieux v. EZ Lube, LLC, et al.*, 12-CV-01791-JLS-WYG (S.D. Cal.) (Served as co-lead counsel; finally approved on December 8, 2014);
- b. *Malta, et al. v. Wells Fargo Home Mortgage, et al.*, 10-CV-1290-IEG (BLM) (Served as co-lead counsel for a settlement class of borrowers in connection with residential or automotive loans and violations of the TCPA in attempts to collect on those accounts; obtained a common settlement fund in the amount of \$17,100,000; final approval granted in 2013);
- c. *Conner v. JPMorgan Chase Bank, et al.*, 10-CV-1284 DMS (BGS) (S.D. Cal.) (finally approved \$11,973,558);
- d. *In Re: Midland Credit Management, Inc., Telephone Consumer Protection Act Litigation*, 11-md-2286-MMA (MDD) (S.D. Cal.) (Counsel for a Plaintiff in the lead action, prior to the action being recategorized through the multi-district litigation process; finally approved for \$18,000,000);
- e. *In Re: Portfolio Recovery Associates, LLC Telephone Consumer Protection Act Litigation*, 11-md-02295-JAH (BGS) (Counsel for a Plaintiff in the lead action, prior to the action being re-categorized through the multi-district litigation process; preliminarily approved);
- f. *Arthur v. SLM Corporation*, 10-CV-00198 JLR (W.D. Wash.) (Nationwide settlement achieving the then-largest monetary settlement in the history of the TCPA concerning calls to cellular telephone at the time: \$24.15 million; final approval granted in 2012);
- g. *Lo v. Oxnard European Motors, LLC, et al.*, 11-CV-1009-JLS-MDD (S.D. Cal.) (Achieving one of the highest per class member payouts in a TCPA action of \$1,331.25 per claimant; final approval granted in 2012);

- 1 h. *Sarabri v. Weltman, Weinberg & Reis Co., L.P.A.*, 10-01777-AJB-NLS
 2 (S.D. Cal.) (Approved as co-lead counsel and worked to obtain a
 3 national TCPA class settlement where claiming class members each
 4 received payment in the amount of \$70.00 per claimant; final approval
 5 granted in 2013);
- 6 i. *Barani v. Wells Fargo Bank, N.A.*, 12-CV-02999-GPC (KSC) (S.D.
 7 Cal.) (Co-lead class counsel in a settlement under the TCPA for the
 8 sending of unauthorized text messages to non-account holders in
 9 connection to wire transfers; finally approved on March 6, 2015 for over
 10 \$1,000,000);
- 11 j. *Mills v. HSBC Bank Nevada, N.A.*, Case No. 12-CV-04010-SI (N.D.
 12 Cal.) (Finally approved for \$39,975,000);
- 13 k. *In Re Jiffy Lube International, Inc.*, MDL No. 2261 (Finally approved
 14 for \$47,000,000.00);
- 15 l. *Jaber v. NASCAR*, 11-CV-1783 DMS (WVG) (S.D. Cal.);
- 16 m. *Ridley v. Union Bank, N.A.*, 11-CV-1773 DMS (NLS) (S.D. Cal.);
- 17 n. *Ryabyshchuk v. Citibank (South Dakota) N.A.*, et al, 11-CV-1236-IEG
 18 (WVG);
- 19 o. *Sherman v. Kaiser Foundation Health Plan, Inc.*, 13-CV-0981-JAH
 20 (JMA) (S.D. Cal.) (Settled for \$5,350,000 and finally approved on May
 21 12, 2015; served as co-lead counsel);
- 22 p. *Rivera v. Nuvel Credit Company LLC*, 13-CV-00164-TJH-OP (E.D.
 23 Cal.);
- 24 q. *Karayan v. Gamestop Corp.*, 3:12-CV-01555-P (N.D. Texas);
- 25 r. *Foote v. Credit One Bank, N.A. et al.*, 13-cv-00512-MWF-PLA (C.D.
 26 Cal.);

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- s. *Webb v. Healthcare Revenue Recovery Group*, 13-cv-00737–RS (N.D. Cal.);
- t. *Couser v. Comenity Bank*, 12-cv-02484-MMA-BGS (S.D. Cal. Oc. 2, 2014) (Finally approved for \$8,475,000 on May 27, 2015 as served as co-lead counsel);
- u. *Couser v. Apria Healthcare, Inc. et al.*, 13-cv-00035-JVS-RNB (C.D. Cal. Oct. 27, 2014) (Finally approved on March 9, 2015 and served as co-lead counsel);
- v. *Rose v. Bank of America Corporation et al.*, 12-cv-04009-EJD (N.D. Cal.) (Finally approved for \$32,000,000 in 2014);
- w. *Newman v. AmeriCredit Financial Services*, 11-cv-03041-DMS-BLM (S.D. Cal.) (finally approving TCPA settlement for over \$6,500,000 on March 28, 2016);
- x. *Fox v. Asset Acceptance, LLC*, 14-cv-00734-GW-FFM (C.D. Cal. July 1, 2016) (finally approved TCPA class action for \$1,000,000; \$200,000 cash and \$800,000 debt relief);
- y. *Barrett v. Wesley Financial Group, LLC*, 13-cv-00554-LAB-KSC (S.D. Cal.) (Class certification granted); and,
- z. *Gehrich v. Chase Bank, N.A.*, 12-cv-5510 (N.D. Cal.) (finally approved for \$34,000,000);
- aa. *Macias v. Water & Power Community Credit Union*, BC515936 (Los Angeles Superior Court) (Class certification granted under the Rosenthal Fair Debt Collection Practices Act; class action settlement finally approved on April 21, 2016);
- bb. *LaPuebla v. BirchBox, Inc.*, 3:15-cv-00498-BEN-BGS (S.D. Cal. 2016) (finally approved settlement in unlawful auto-renewal action);

- 1 cc. *Stemple v. QC Holdings, Inc.*, 12-cv-01997-BAS-WVG (S.D. Cal. Nov.
2 7, 2016) (finally approved for \$1,500,000);
- 3 dd. *Abdeljalil v. GE Capital Retail Bank*, 12-cv-02078–JAH–MDD (S.D.
4 Cal.) (Class certification granted where the plaintiffs proposed a
5 keyword search of the defendant’s account notes to identify class
6 members; finally approved settlement for \$7,000,000);
- 7 ee. *Hooker v. Sirius XM Radio Inc.*, 4:13-cv-00003-AWA-LRL (E.D.Va.
8 December 22, 2016) (Served as co-lead counsel in finally approved
9 TCPA class action settlement with a monetary fund of \$35,000,000);
- 10 ff. *Medeiros v. HSBC Card Services, Inc. et al.*, 2017 U.S. LEXIS 178484
11 (C.D. Cal. Oct. 23, 2017) (finally approved CIPA class action settlement
12 for \$13,000,000)
- 13 gg. *Knell, et al. v. FIA Card Services, N.A.*, 13-CV-01653-AJB-WVG (S.D.
14 Cal.) (California class action settlement under Penal Code 632, et seq.,
15 for claims of invasion of privacy. Settlement resulted in a common fund
16 in the amount of \$2,750,000; finally approved in August 15, 2014);
- 17 hh. *Hoffman v. Bank of America Corporation*, 12-CV-00539-JAH-DHB
18 (S.D. Cal.) (California class action settlement under Penal Code 632, et
19 seq., for claims of invasion of privacy. Settlement resulted in a common
20 fund in the amount of \$2,600,000; finally approved on November 6,
21 2014 and served as co-lead counsel);
- 22 ii. *Mount v. Wells Fargo Bank, N.A.*, BC395959 (Sup. Ct. Los Angeles)
23 (finally approved for \$5,600,000 in action under Cal. Pen. Code § 630,
24 et seq.);
- 25 jj. *Zaw v. Nelnet Business Solutions, Inc. et al.*, No. 13-cv-05788-RS (N.D.
26 Cal.) (finally approved in 2014 for \$1,188,110 in action under Cal. Pen.
27 Code § 630, et seq.);

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- kk. *Ronquillo-Griffin v. Telus Communications, Inc. et al.*, 3:17-cv-00129-JM-MLB (S.D. Cal.);
- ll. *Foote v. Credit One Bank, LLC*, 2:13-cv-08605-MWF-PLA (C.D. Cal.)
- mm. *Olney v. Job.com, Inc. et al.*, 13-cv-02004-AWI-SAB (E.D. Cal.);
- nn. *Bohkle v. U.S. Bank, N.A.*, 12-cv-09247-RGK-E (C.D. Cal.);
- oo. *Dake v. Receivables Performance Management, LLC*, 5:12-cv-01680-VAP-SP (C.D. Cal.);
- pp. *Garcia v. Earthlink, Inc.*, 3:12-CV-01129-DMS-BLM (S.D. Cal.);
- qq. *Montegna v. Portfolio Recovery Associates, LLC*, 3:12-cv-00764-MMA-BGS (S.D. Cal.);
- rr. *Medeiros v. HSBC Card Services, Inc. et al.*, 2017 U.S. LEXIS 178484 (C.D. Cal. Oct. 23, 2017);
- ss. *Caldera v. Am. Med. Collection Agency*, 2017 U.S. Dist. LEXIS 99239 (C.D. Cal. June 27, 2017) (Order certifying nationwide TCPA class action);
- tt. *Burkhammer v. Allied Interstate, LLC*, 2017 Cal. Super. LEXIS 109 (Sup. Ct. San Luis Obispo) (RFDCPA class action finally approved on October 30, 2017);
- uu. *Moreno-Peralta v. TRS Recovery Services, Inc.*, 2017 Cal. Super. LEXIS 548 (Sup. Ct. San Luis Obispo Oct. 10, 2017) (RFDCPA class action preliminarily approved);
- vv. *Luster v. Wells Fargo Dealer Services, Inc.*, 15-cv-1058 (TWT) (N.D. Ga. November 8, 2017) (TCPA class action finally approved in the amount of \$14,834,058.00);

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ww. *McPolin v. Credit Service of Logan*, 16-cv-116 BSJ (Utah District Court) (FDCPA class action with consumers to each receive \$1,428.57, debt relief, and tradeline deletion finally approved on November 9, 2017);

xx. *Reid v. I.C. System, Inc.*, 2017 U.S. Dist. LEXIS 43770 (D.Ariz. March 24, 2017) (TCPA class actions finally approved in the amount of \$3,500,000);

yy. *Couser v. Dish One Satellite, LLC*, 5:15-cv-02218-CBM-DTB (C.D. Cal. November 21, 2017) (TCPA class action approved in the amount of \$935,000);

zz. *Giffin v. Universal Protein Supplements Corporation d/b/a/ Universal Nutrition et al.*, No. BC613414 (Superior Court of California, County of Los Angeles) (recently finally approved class action settlement alleging violation of California law involving Made in USA representations);

aaa. *Pastor v. Bank of America*, No. 3:15-cv-03821-VC (N.D.Cal. Aug. 16, 2018) (granting final approval of class action for alleged unlawful credit pulls); and,

bbb. *Maur v. Transform SAC, LLC, et al.*, CV18-831 (Yolo County Superior Court) (Health Studios Services Act class action preliminarily approved on March 26, 2019).

19. Many of the cases listed above, which have settled, resulted in the creation of combined common funds and/or distribution to class member in the hundreds of millions of dollars. The outstanding results mentioned above are a direct result of the diligence and tenacity shown by Kazerouni Law Group, APC and myself, in successfully prosecuting complex class actions.

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20. I argued before the Ninth Circuit Court of Appeals in the case of *Knutson v. Sirius XM Radio*, No. 12-56120 (9th Cir. 2014) as co-lead counsel, which resulted in an order in favor of my client.

21. On December 6, 2016, I argued before the Ninth Circuit Court of Appeals in the case of *Marks v. Crunch San Diego, LLC*, No. 14-56834. The Ninth Circuit ruled in our favor in this matter.

22. In April of 2017, I argued before the Ninth Circuit Court of Appeals in the case of *Afewerki v. Anaya Law Group, et al.*, No. 15-56510.

**ADDITIONAL RELEVANT TRAINING,
SPEAKING/TEACHING ENGAGEMENTS AND ASSOCIATIONS**

23. I am an adjunct professor at California Western School of Law where I teach a three-credit course in consumer law.

24. I have undergone extensive training in the area of consumer law and the Telephone Consumer Protection Act. The following is a list of recent training conferences I attended:

- a. Four-day National Consumer Law Center Conference; Nashville, TN – 2008;
- b. Three-day National Consumer Law Center Conference; Portland, OR –2008;
- c. Three-day National Consumer Law Center Conference; San Diego, CA - 2009;
- d. Three-day National Consumer Law Center Conference; Seattle, WA - 2011;
- e. National Consumer Law Center Conference in 2013;
- f. National Consumer Law Center Conference in 2014;
- g. National Consumer Law Center Conference in 2015;

- 1 h. National Consumer Law Center Conference in 2016;
- 2 i. Three-day CAALA Conference; Las Vegas, NV – 2009;
- 3 j. Three-day CAALA Conference; Las Vegas, NV – 2013;
- 4 k. Three-day CAALA Conference; Las Vegas, NV – 2015;
- 5 l. Three-day CAALA Conference; Las Vegas, NV – 2016;
- 6 m. Three-day COAC Conference – 2014 and 2015;
- 7 n. Speaker ABA National Conference, Business Litigation Section; Trends
- 8 in Consumer Litigation; San Francisco, CA – 2013;
- 9 o. Speaker at the ABA TCPA National Webinar (Consumer Protection,
- 10 Privacy & Information Security, Private Advertising Litigation, and
- 11 Media & Technology Committees) – September 2013;
- 12 p. Spoke at the 2014 ACA Conference in November 2014;
- 13 q. Speaker at ACI Conference in Dallas, TX in September of 2016
- 14 concerning The Borrower's Perspective: Insight From The Plaintiffs' Bar
- 15 and Consumer Advocates;
- 16 r. Speaker on TCPA panel in September of 2016 at the Annual Consumer
- 17 Financial Services Conference;
- 18 s. Spoke at the 2016 CAOC Conference in November of 2016;
- 19 t. Presented at the 2017 CAOC seminar in Palm Springs, CA; and,
- 20 u. Speaker at national webinar on June 7, 2017 for the CAOC, entitled,
- 21 Understanding the Fair Debt Collection Practices Act.

22 25. As one of the main plaintiff litigators of consumer rights cases in the State of

23 California, I have been requested to and have made regular presentations to

24 community organizations regarding debt collection laws and consumer rights.

25 These organizations include Whittier Law School, Iranian American Bar

26 Association, Chapman Law School, University of California, Irvine, and

27 California Western School of Law.

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1 26.I was the principle anchor on Time Television Broadcasting every Thursday
2 night as an expert on consumer law generally, and the TCPA specifically,
3 between 2012 and 2013.

4 27.I was a panelist in a webinar, ABA Telephonic Brown Bag re: TCPA, on
5 August 25, 2015.

6 28.I lectured in Class Action Trends at the CAOC 2015 Conference in San
7 Francisco.

8 29.I lectured on the TCPA before the ABA Business Law Section, Consumer
9 Financial Services Committee in January 2016 at an event in Utah entitled,
10 “Impact of the FCC’s 2015 Rulings on TCPA Litigation.”

11 30.I was a speaker at The Knowledge Group’s national webinar in 2016 on the
12 impact of the Federal Communications Commission’s 2015 ruling on the
13 TCPA.

14 31.I was named Rising Star by San Diego Daily Tribune in 2012, and Rising Star
15 in Super Lawyers Magazine in 2013, 2014 and 2015. I was named a Super
16 Lawyer by Super Lawyers Magazine in 2016, 2017 and 2018.

17 32.I was selected for membership into The National Trial Lawyers: Top 40 Under
18 40 in 2016.

19 33.In January of 2016, I spoke on the impact of the Federal Communications
20 Commission’s 2015 Declaratory Ruling on TCPA litigation at the ABA
21 National Convention in Salt Lake City, Utah.

22 34.In May of 2016, I spoke on Class Action Trends at the CAOC seminar in Palm
23 Springs, California.

24 35.I lectured on the TCPA before the ABA Business Law Section, Consumer
25 Financial Services Committee in January 2016 at an event in Utah entitled,
26 “Impact of the FCC’s 2015 Rulings on TCPA Litigation.”

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36. In 2016, I wrote an article entitled “Finding a Balance” that was published in the Nutrition Business Journal, concerning a lawsuit filed under the Racketeer Influenced and Corrupt Organization Act.

37. I was published in the Daily Journal in September of 2016, with the title, “The FDCPA: The Forgotten Statute.”

38. I am often called upon to give legal analysis on popular television and radio shows such as Dr. Drew Midday Live and Fox 5.

39. In March of 2016, I moderated the Judges Panel on Class Action Trends and Federal Litigation Trends at the NCLC Conference.

40. I spoke on privacy rights on a panel before the California State Bar Convention in 2016.

41. I spoke at the 22nd National Forum on Residential Mortgage Litigation & Regulatory Enforcement conference on January 22, 2017.

42. I was a speaker at the Western Trial Lawyers Association conference on Class Action Trends in 2017, held in Steamboat Springs, Colorado.

43. I was a speaker at Consumer Attorneys of California 2017 seminar on hot litigation topics at Lake Tahoe, Nevada.

44. I wrote an article entitled, Collateral Damage, Beyond the personal injury: When creditors and collection agencies stalk your client, published in the September 2017 edition of Plaintiff magazine.

45. I presented at Mass Torts Made Perfect regarding Modern Trends in the TCPA in April 2019.

46. I am a member in good standing of the following local and national associations:

- a. Consumer Attorneys Association of Los Angeles;
- b. The Orange County Bar Association;
- c. Orange County Trial Lawyers Association;

