

BLOOD HURST & O' REARDON, LLP

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13 Attorneys for Plaintiffs

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

16 HEATHER TURREY, et al.,  
17 Plaintiffs,  
18 v.  
19 VERVENT, INC., etc., et al.,  
20 Defendants.  
21

Case No. 3:20-cv-00697-DMS-AHG  
**CLASS ACTION**

**DECLARATION OF OLIVER  
FIATY-AMENOUVOR IN SUPPORT  
OF MOTION FOR CLASS  
REPRESENTATIVE SERVICE  
AWARD**

**Date: August 16, 2024**  
**Time: 1:00 p.m.**

District Judge Dana M. Sabraw  
Courtroom 13A, 13th Fl. (Carter-Keep)  
Magistrate Judge Allison H. Goddard  
Chambers Room 3B, (Schwartz)

Complaint Filed: April 10, 2020  
Trial Date: June 8, 2023

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1 I, OLIVER FIATY-AMENOUVOR, declare:

2 1. I am a named plaintiff and Class Representative in the case called *Turrey*  
3 *v. Vervent, Inc.*, S.D. Cal. No. 3:20-cv-00697-DMS-AHG. I have personal knowledge  
4 of the facts stated below and, if called upon to testify, would be competent to do so.

5 2. I was designated as a Class Representative in the Amended Motion for  
6 Class Certification and was included in a declaration in support of the motion to  
7 appoint me as the Class Representative in this case. *See* Dkt. No. 143-2. Class  
8 certification was granted, and I was appointed a class representative for the Class  
9 RICO Claim, the FDCPA subclass and the RFDCPA subclass, by this Court on  
10 January 11, 2023. *See* Dkt. No. 151

11 3. I am a resident of the State of California. I volunteered to be a plaintiff  
12 and to represent other borrowers in this class action because I believe it is wrong for  
13 companies to service and collect on fraudulent student loan products. I understand  
14 that I was appointed by the Court to be the representative of the class, and it is my  
15 duty to act in the best interest of the class and to not put my interests ahead of theirs  
16 in this case. I believe that I have carried out this duty.

17 4. I retained my attorneys in September 2022 and have kept in contact with  
18 them and stayed informed on the progress of the case. I have answered all of my  
19 attorneys' questions regarding my experience with PEAKS. From the time I agreed  
20 to act as a class representative, I understood that trial was quickly approaching and  
21 that I would have to make myself available very quickly to meet the discovery and  
22 trial schedule.

23 5. After I was appointed as the Class Representative by the Court, I have  
24 spent a lot of time and effort on this case. I spoke with my attorneys numerous times  
25 about my experience with PEAKS, Vervent Inc., and ITT Technical School. I have  
26 also spoken to them regularly about Defendants' discovery requests, my deposition,  
27 the case in general, and the jury trial.

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1           6. I reviewed and spoke with my attorneys about the interrogatories and  
2 request for documents that Defendants served. I answered all the questions to the best  
3 of my knowledge and searched my home, emails, and other sources for any  
4 documentation related to my PEAKS loan. I sent my attorneys account statements  
5 and documents that were in my possession. These documents were eventually used  
6 during the trial. After the answers to the interrogatories and the responses to the  
7 request for documents were prepared by my attorneys, I reviewed them to make sure  
8 they were accurate. I signed a verification of my interrogatory answers swearing under  
9 the penalty of perjury that they were truthful to the best of my knowledge.

10           7. In preparing for my deposition, I had several video conference meetings  
11 and/or phone calls with my attorneys where they asked me detailed questions about  
12 my background, my education history, and the reasons why I took out a PEAKS loan.  
13 I re-read the amended complaint and my previous answers to interrogatories and  
14 request for production of documents. During the meetings we also went through a  
15 mock deposition where they would ask questions as if they were Defendants'  
16 attorneys. On October 21, 2022, I attended the deposition. I had to answer all  
17 questions from Defendant's attorneys under oath and subject to the penalty of perjury.

18           8. On March 22, 2023, I attended a settlement conference on Zoom with  
19 Magistrate Judge Allison Goddard. In order to attend, I had to take time off work,  
20 however it was important for me to attend in order to demonstrate my commitment  
21 and involvement in the case. I spoke to my attorneys beforehand in preparation for  
22 the settlement conference and was debriefed by them afterwards.

23           9. Prior to trial, I had several meetings to prepare to testify and discuss how  
24 the trial would work. I immersed myself in the case to ensure I was prepared to answer  
25 any questions from Defendants' attorneys. I re-read the complaints, my answers to  
26 interrogatories and requests for production of documents, and my deposition  
27 transcript several times to ensure my trial testimony would be accurate and truthful. I  
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1 was very nervous to testify in front of everyone at the trial. I had never testified at a  
2 trial before but felt strongly about the case.

3 10. On June 9, 2023, I traveled to downtown San Diego from my home in  
4 La Mesa, CA to prepare for, attend, and testify at the trial. I spoke with my attorneys  
5 regularly throughout the trial to keep up to date about the proceedings.

6 11. On June 9, 2023, I was called to testify at the trial. I was subjected to  
7 several rounds of questioning by my attorney and by Defendants' attorney. I answered  
8 everything to the best of my knowledge. I continue to communicate with my attorneys  
9 to get updates on the motions brought since the trial and the overall progress of the  
10 case. I remain committed to the case and will stay active and involved.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed on June 19, 2024, at La Mesa, California.

Oliver Fiaty-Amenouvor  
Oliver Fiaty-Amenouvor (Jun 19, 2024 16:55 PDT)

OLIVER FIATY-AMENOUVOR

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Electronic Mail Notice List.

I certify under penalty of perjury that the foregoing is true and correct. Executed on June 27, 2024.

*s/ Timothy G. Blood*

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TIMOTHY G. BLOOD

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