

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

**DECLARATION OF SHARON  
GRACE ON BEHALF OF PAUL  
ARONS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
AWARD OF ATTORNEYS' FEES,  
REIMBURSEMENT OF EXPENSES,  
AND SERVICE AWARDS FOR  
CLASS REPRESENTATIVES**

**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)

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1 I, SHARON GRACE, declare as follows:

2 1. I am an attorney with the Law Office of Paul Arons.

3 2. I am also the widow of Paul Arons, who died on October 14, 2023, of  
4 complications from a stroke. I practiced law with Mr. Arons from 1985—first in  
5 California, then in Washington State—until his death.

6 3. I am making this declaration on behalf of Mr. Arons in support of  
7 Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses, and Service  
8 Awards for Class Representatives in this litigation.

9 4. Mr. Arons graduated from Golden Gate University School of Law in  
10 1978, where he was a law review writer and editor. While in school, he was a law  
11 clerk for two years in the impact litigation unit of the San Francisco Neighborhood  
12 Legal Assistance Foundation. While employed at the San Francisco Neighborhood  
13 Legal Assistance Foundation, he assisted on several class actions successfully  
14 challenging different aspects of the California Welfare Reform Act of 1969.

15 5. After graduation, Mr. Arons began work as an associate at the law office  
16 of Gladstein & Gladstein in San Francisco. In 1981, he became a partner in the office  
17 of Gladstein & Arons, which later became Gladstein, Benjamin & Arons, which, in  
18 1986, became the Law Office of Paul Arons. Initially Mr. Arons focused on labor and  
19 employment law, representing plaintiffs in a wide variety of employment disputes,  
20 including those concerning, race, sex and age discrimination and wage payment. He  
21 represented individuals and labor unions on employment matters in private labor  
22 arbitrations, in administrative proceedings before the California Department of Fair  
23 Employment and Housing, the United States Equal Employment Opportunity  
24 Commission, the United States Department of Labor, the California Department of  
25 Industrial Relations, the National Labor Relations Board, and the California  
26 Unemployment Insurance Appeals Board, in hearings and jury trials in the California  
27 Superior Court and the United States District Court, and in appeals before the  
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1 California Court of Appeals and Ninth Circuit Court of Appeals. Beginning in 1985,  
2 Mr. Arons co-counseled class actions pursued in both federal and state court.

3 6. Since approximately 1993 much of Mr. Arons' law practice was focused  
4 on consumer class actions filed under the Fair Debt Collection Practices Act. Notable  
5 cases that Mr. Arons co-counseled included *Newman v. Checkrite California, Inc.*,  
6 Civ. No. 93-1557 LKK (E.D. Cal.), a seminal case in the area of FDCPA litigation  
7 against check collectors, in which a \$4.3 million settlement fund was created. The  
8 published summary judgment decision in that case, *Newman v. Checkrite California,*  
9 *Inc.*, 912 F. Supp. 1354 (E.D. Cal. 1995), has been cited in over one hundred federal  
10 court decisions. Mr. Arons also represented plaintiffs in a number of other class  
11 actions filed pursuant to the FDCPA. *Ballard v. Equifax Check Servs., Inc.*, Civ. No.  
12 S-96-1532 FCD (E.D. Cal., filed 8/26/96), was a case that involved almost 1,500,000  
13 class members, and settled for approximately \$8,000,000. There are three published  
14 opinions arising from that lawsuit: *Ballard v. Equifax Check Servs., Inc.*, 27 F. Supp.  
15 2d 1201(E.D. Cal. 1998) [granting summary judgment for the individual plaintiff],  
16 *Ballard v. Equifax Check Servs., Inc.*, 186 F.R.D. 589 (E.D. Cal. 1999) [granting class  
17 certification], and *Ballard v. Equifax Check Servs., Inc.*, 158 F. Supp. 2d 1163 (E.D.  
18 Cal. 2001) [granting classwide summary judgment on liability issues.] *Irwin v.*  
19 *Mascott*, Civ. No. 97-4737 JL (E.D. Cal., filed 12/31/97), was an FDCPA class action  
20 that involved approximately 600,000 class members and settled for more than a  
21 million dollars. There are four published decisions in that case: *Irwin v. Mascott*, 96  
22 F. Supp. 2d 968 (N.D. Cal. 1999) [granting class certification], *Irwin v. Mascott*, 94  
23 F. Supp. 2d 1052 (N.D. Cal. 2000) [denying defendants' motion to add third-party  
24 defendants], *Irwin v. Mascott*, 112 F. Supp. 2d 937 (N.D. Cal. 2000) [granting  
25 summary judgment and issuing permanent injunction], and *Irwin v. Mascott*, 370 F.3d  
26 924 (9th Cir. 2004) [affirming contempt order against defendants]. Mr. Arons co-  
27 counseled *Hunt v. Check Recovery Sys.*, 241 F.R.D. 505 (N.D. Cal. 2007), an FDCPA  
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1 class action involving unlawful check collection charges. Plaintiffs prevailed on  
2 summary judgment. *Hunt v. Check Recovery Sys.* 178 F. Supp. 2d 1157 (N.D. Cal.  
3 2007). Defendant appealed that decision to the Ninth Circuit, which referred the case  
4 to the California Supreme Court to decide the state law issue of whether a debt  
5 collector may seek both a statutory service charge, and prejudgment interest on a  
6 dishonored check. Mr. Arons argued the issue before the California Supreme Court,  
7 which ruled for plaintiffs and against the debt collector. *Imperial Merchant Servs.,*  
8 *Inc. v. Hunt*, 47 Cal. 4th 381 (Cal. 2009), [97 Cal. Rptr. 3d 464]. In an interlocutory  
9 appeal in the same case, Mr. Arons succeeded in obtaining the first federal appellate  
10 court ruling that a district court has discretion to shift class notice costs to defendants,  
11 once liability is established. *Hunt v. Imperial Merchant Servs., Inc.*, 560 F.3d 1137  
12 (9th Cir. Cal. 2009).

13 7. Since becoming licensed to practice law in the State of Washington in  
14 2014, Mr. Arons represented Washington consumers in successful class actions  
15 against debt collectors. These actions included *Cavnar v. Bounceback*, 2:14-CV-235-  
16 RMP (E.D. WA) and *Dibb v. Allianceone Receivables Mgmt.*, No. 14-5835 RJB  
17 (W.D. Wash.), a class action, in which a settlement was negotiated that provided  
18 almost \$2,000,000 in direct payments and debt relief to class members. In another  
19 case involving tenant post-move out charges imposed by a property management  
20 company, *Jammeh v. HNN Associates, et al.*, 2:19-cv-00620 (W.D. Wash), plaintiffs  
21 obtained both prospective relief for a class of tenants, and \$1,600,000 in monetary  
22 relief. Mr. Arons was plaintiff's counsel in a number of other class action lawsuits  
23 and was continually involved in class action litigation since 1993. A LEXIS search  
24 shows over 100 federal district and appellate court decisions in cases where Mr. Arons  
25 was either lead or co-lead counsel.

26 8. In approximately 2003, Mr. Arons was honored by the Impact Fund for  
27 his work in *Newman v. Checkrite*. In 2006, Mr. Arons was honored as Consumer  
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1 Advocate of the Year by the National Association of Consumer Advocates. Mr. Arons  
2 participated in a number of presentations at the conferences of the National Consumer  
3 Law Center, the National Association of Consumer Advocates and the Northwest  
4 Consumer Law Center.

5 9. Having worked with Mr. Arons for nearly 40 years and co-counseled  
6 many cases with him, I am familiar with the time-keeping and billing practices of the  
7 Law Office of Paul Arons, and in particular, with Mr. Arons' time keeping and billing  
8 practices.

9 10. According to Mr. Arons' time records, he began billing time in this case  
10 in connection with drafting the complaint on November 8, 2019, and continued billing  
11 time through August 23, 2023 in connection with the motion to amend the judgment.

12 11. In the course of representing Plaintiffs and the class as co-counsel for  
13 nearly four years, Mr. Arons recorded 404 hours of time. It was his practice not to  
14 record time for minor tasks, such as short telephone calls, scheduling, or reviewing  
15 short emails where a response is not required. Further, when preparing a fee petition,  
16 it was his practice to use billing judgment, if he believed that he had expended too  
17 much time on a task. However, because he is not able to review his time records in  
18 this case, I have made an across-the-board reduction of 10% to his hours, to 363.6  
19 hours.

20 12. My recollection is that the last fee request Mr. Arons made was around  
21 five years ago and that at that time he requested an hourly rate of \$550.

22 13. I am requesting an hourly rate be awarded in this case of \$700/hr, to  
23 reflect both inflation, his experience and his senior status.

24 14. The only expense Mr. Arons incurred was his round-trip flight between  
25 Seattle and San Diego for the trial, in the amount of \$337.80.

26 15. In summary, the Law Office of Paul Arons is requesting attorney fees in  
27 the amount of \$254,520.00 and expenses in the amount of \$337.80.

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1 I declare under penalty of perjury under the laws of the State of California and  
2 the United States of America that the foregoing is true and correct. Executed on June  
3 26, 2024, at Friday Harbor, Washington.

4  
5 By:   
6 SHARON GRACE

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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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