

BLOOD HURST & O' REARDON, LLP

1 BLOOD HURST & O'REARDON, LLP
TIMOTHY G. BLOOD (149343)
2 LESLIE E. HURST (178432)
JAMES M. DAVIS (301636)
3 501 West Broadway, Suite 1490
San Diego, CA 92101
4 Tel: 619/338-1100
619/338-1101 (fax)
5 tblood@bholaw.com
lhurst@bholaw.com
6 jdavis@bholaw.com

7 LANGER GROGAN & DIVER, PC
IRV ACKELSBERG (*pro hac vice*)
8 JOHN J. GROGAN (*pro hac vice*)
DAVID A. NAGDEMAN (*pro hac vice*)
9 1717 Arch Street, Suite 4020
Philadelphia, PA 19103
10 Tel: 215/320-5660
215/320-5703 (fax)
11 iackelsberg@langergrogan.com
jgrogan@langergrogan.com
12 dnagdeman@langergrogan.com

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.

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

**DECLARATION OF JEFFREY
SAZON 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

28

BLOOD HURST & O' REARDON, LLP

1 I, JEFFREY SAZON, 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 and the RFDCPA subclass, by this Court on January 11, 2023. *See* Dkt.
10 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 interests 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've also
26 spoken to them regularly about Defendants' discovery requests, my deposition, the
27 case in general, and the jury trial.

28

BLOOD HURST & O' REARDON, LLP

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 meetings and phone calls
11 with my attorneys where they asked me detailed questions about my background, my
12 education history, and the reasons why I took out a PEAKS loan. I re-read the
13 complaints and my previous interrogatories and request for production of documents
14 answers. During the meetings we also went through a mock deposition where they
15 would ask questions as if they were Defendants' attorneys. On October 17, 2022, I
16 attended the deposition. I had to answer all questions from Defendants' attorney under
17 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
28

BLOOD HURST & O' REARDON, LLP

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 11, 2023, I traveled to San Diego from my home in Eastvale,
4 California to prepare for, attend, and testify at the trial. I attended two days of the trial
5 on June 12th and 13th. I spoke with my attorneys regularly throughout the trial to
6 keep up to date about the proceedings.

7 11. On June 13, 2023, I was called to testify at the trial. I was subjected to
8 several rounds of questioning by my attorney and by Defendants' attorney. I answered
9 everything to the best of my knowledge. I continue to communicate with my attorneys
10 to get updates on the motions brought since the trial and the overall progress of the
11 case. I remain committed to the case and will stay active and involved.

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

13
14 Executed on 24/06/19, 2024, at Eastvale, California.


Jeffrey Sazon (Jun 19, 2024 19:06 PDT)

15
16 JEFFREY SAZON

17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

TIMOTHY G. BLOOD

BLOOD HURST & O'REARDON, LLP
501 West Broadway, Suite 1490
San Diego, CA 92101
Tel: 619/338-1100
619/338-1101 (fax)
tblood@bholaw.com

BLOOD HURST & O' REARDON, LLP