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Attorneys for Plaintiff,

Roy Lo

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – UNLIMITED CIVIL**

**ROY LO, Individually and On Behalf of
All Others Similarly Situated,**

Plaintiff,

v.

NUTRIBULLET LLC,

Defendant.

Case No.: 21STCV12852

**DECLARATION OF GIL MELILI IN
SUPPORT OF PLAINTIFF'S MOTION
FOR ATTORNEYS' FEES, COSTS, AND
SERVICE AWARD**

JUDGE: Hon. William F. Highberger
DEPT.: 10

DECLARATION OF GIL MELILI

I, GIL MELILI, declare:

1. I am one of the attorneys for the Plaintiff in this action, Roy Lo (“Plaintiff”) against Defendant Nutribullet LLC, (“Nutribullet” or “Defendant”).
2. I am over the age of 18 and fully competent to make this declaration.
3. I was admitted to the State Bar of California on May 20, 2021, and have been a member in good standing ever since that time. I have litigated cases in both state and federal courts in California. I am admitted in every federal district court in California. I am also admitted in the United States District Court for the Northern District of Illinois.
4. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify thereto, except as to those matters which are explicitly set forth as based upon my information and belief, and as to such matters, I am informed and believe that they are true and correct.
5. I am an associate at Kazerouni Law Group, APC, and I am primarily tasked with consumer and employment class action cases.
6. I submit this declaration in support of Plaintiff’s Motion for Attorneys’ Fees, Costs, and Service Award.
7. I have been highly involved with every aspect of this case since its inception.
8. I am unaware of any conflict of interest between Plaintiff and the Settlement Class members, or between Plaintiff and his counsel in this matter.

HOURS INCURRED

9. As of September 6, 2022, I have incurred approximately 48.60 hours in assisting with the litigation of this action. All of these hours were logged contemporaneously in the normal course of business and are available at the Court’s request. Specifically, I have incurred approximately: 1.50 hours on communicating with co-counsel; 0.30 hours on communications (other); 20 hours on mediation/settlement; 25.50 hours on motion practice (including the motion for preliminary approval, as well as the motion for attorneys’ fees,

costs and service award); 0.70 on administrative tasks; and 0.60 hours on miscellaneous tasks.

10. I anticipate incurring approximately at least another 10 hours assisting Class Counsel in preparing for the final approval hearing, for a total of 58.60 hours in this action.

11. Based on my experience litigating consumer class actions, I believe my proposed hourly rate of \$240.00 is fair and reasonable.

COUNSEL'S EXPERIENCE

12. Since being admitted to the California bar in 2021, I have been engaged exclusively in the area of consumer rights litigation, including but not limited to the areas of fair debt collections, debt collection defense, employment class action litigation, and class action litigation under California's invasion of privacy statutes (e.g., CIPA, the Telephone Consumer Protection Act, Fair Debt Collection Practices Act, and Fair Credit Reporting Act), among other areas of consumer litigation.

13. I was recently approved at a rate of \$230.00/hour in the CIPA class action case of *Franklin v. Ocwen Loan Servicing, LLC*, 3:18-cv-03333-SI (N.D. Cal.).

14. I currently serve as class counsel in the wage-and-hour class action case of *Nese v. Scenario Cockram USA, Inc.*, 8:21-cv-00814-DOC-JDE (C.D. Cal.), in which I have requested fees at a rate of \$275.00/hour.

15. I regularly assist partners and other seasoned associate attorneys at the law firm with preparing for class certification hearings, class mediations, and class action settlements as well as preparing for and negotiating mass settlements. Some of the matters I have worked on in these regards include, but are not limited to, the following:

a. *In re Ford Motor Co. DPS6 Powershift Transmission Products Liability Litigation*, MDL No. 2814 (C.D. Cal.) (assisted with drafting mediation brief for two-day mediation, which I attended and assisted co-counsel in negotiating settlement for thirty Plaintiffs);

b. *Anthony Barbano, et al. v. JP Morgan Chase Bank, N.A.*, No. 5:19-cv-01218-JGB-SP (C.D. Cal.) (assisted with drafting final approval motion and motion for

attorneys' fees, costs and service award in a class action involving claims under RESPA); and

c. *Jennifer Goodwin v. K M P Enterprises d/b/a Powell Electric*, No. 20STCV18428 (Sup. Ct. Los Angeles) (assisted with drafting preliminary approval motion in a class action involving claims under CIPA).

16. I have also assisted with drafting appellate briefs and preparing co-counsel for oral arguments before the Ninth Circuit in the following matters:

a. *Ami Dunn v. Global Trust, LLC, et al.*, No. 21-10120 (9th Cir. 2021); and

b. *Sylvester v. Merchants Credit Corp.*, 2021 U.S. App. LEXIS 31528 (9th Cir. 2021).

I declare under penalty of perjury under the laws of California that the foregoing is true and correct, and that this declaration was executed on September 7, 2022.

By: *Gil Melili*
Gil Melili