

1 **KAZEROUNI LAW GROUP, APC**  
2 Abbas Kazerounian, Esq. (SBN: 249203)  
3 ak@kazlg.com  
4 Pamela E. Prescott, Esq. (328243)  
5 pamela@kazlg.com  
6 245 Fischer Avenue, Unit D1  
7 Costa Mesa, CA 92626  
8 Telephone: (800) 400-6808  
9 Facsimile: (800) 520-5523

10 *Attorneys for Plaintiff,*  
11 Jeffrey A. Almada

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

14 **JEFFREY A. ALMADA, on behalf of**  
15 **himself and of all other similarly**  
16 **situated class members,**

17 **Plaintiff,**

18 **v.**

19 **KRIGER LAW FIRM, A.P.C.,**

20 **Defendant.**

21 **CASE No. 3:19-cv-02109-TWR-MDD**

22 **DECLARATION OF SCHUYLER**  
23 **HOFFMAN, ESQ. IN SUPPORT OF**  
24 **COUNSEL'S HOURLY RATES**

**KAZEROUNI**  
**LAW GROUP, APC**

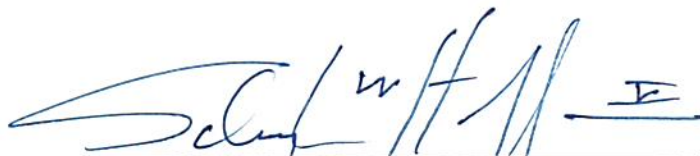
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**I, SCHUYLER HOFFMAN, ESQ., declare:**

1. I regularly practice before the District Courts and State Courts of California, and I am familiar with the hourly rates charged by attorneys who practice in these Courts, including the Southern District of California.
2. If called as a witness, I would competently testify to the matters herein from personal knowledge.
3. I am writing this declaration in support of Class Counsel’s requested hourly rates in Plaintiff’s Motion for Attorneys’ Fees, Costs and Service Award.
4. I was admitted to the State Bar of California in 2008, and I am currently in good standing. My law firm is based in San Diego County.
5. A large part of my practice focuses on consumer related issues and litigation. I represent clients throughout Southern California (including San Diego County), focusing on legal matters involving residential real estate disputes, landlord/tenant disagreements, and other consumer-based fraud claims.
6. I have known Mr. Kazerounian for several years, and I am familiar with his legal work. I am also familiar with the legal work completed by the attorneys at Kazerouni Law Group, APC.
7. I believe that the hourly rate in the Southern District of California for an attorney with Abbas Kazerounian’s experience and expertise in consumer litigation would be in the range of \$785.00 per hour for this type of complex consumer class action litigation. Therefore, \$785.00 per hour is a reasonable and appropriate hourly rate for Mr. Kazerounian.
8. I also believe that the hourly rate of \$600 in the Southern District of California for a partner with over 10 years of experience handling consumer protection matters and class action litigation is reasonable and appropriate.
9. Based on my experience, hourly rates ranging between \$250-\$450 for associate attorneys who handle complex consumer class action litigation is also reasonable and appropriate in this District.

1 I declare under penalty of perjury under the laws of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was  
3 executed on October 18, 2022.

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7 SCHUYLER V. V. HOFFMAN V, ESQ.

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