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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 EDWARD S.**  
 23 **DIAB, ESQ. IN SUPPORT OF**  
 24 **COUNSEL’S HOURLY RATES**

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

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**I, EDWARD S. DIAB, ESQ., declare:**

1. I regularly practice before the District 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 2009, and I am currently in good standing. My law firm in which I am a founding partner is based in San Diego, California.
5. A large part of my practice focuses on complex consumer related issues and litigation, including complex mass tort actions. Among other complex matters, I have represented numerous plaintiffs with property damage claims arising out of California wildfires.
6. I have also been personally appointed to several leadership positions on various plaintiff's committees where I oversaw numerous complex actions.
7. 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.
8. 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 complex consumer class action litigation. Therefore, \$785.00 per hour is a reasonable and appropriate hourly rate for Mr. Kazerounian.
9. 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.

1 10. Based on my experience, I believe that hourly rates ranging between \$250-\$450  
2 per hour for associate attorneys who handle complex consumer class action  
3 litigation is also reasonable and appropriate in the Southern District of California.  
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5 I declare under penalty of perjury under the laws of California and the United  
6 States of America that the foregoing is true and correct, and that this declaration was  
7 executed on October 18, 2022.  
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9 /s/ Edward S. Diab, Esq.  
10 EDWARD S. DIAB, ESQ.  
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