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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

IN RE: RENOVATE AMERICA FINANCE) Case No. RICJCCP4940
CASES)

_____) **DECLARATION OF C. MARIO**
_____) **JARAMILLO, ESQ. IN SUPPORT OF**
_____) **PLAINTIFFS' MOTION FOR AWARD**
_____) **OF ATTORNEYS' FEES,**
THIS DOCUMENT RELATES TO:) **REIMBURSEMENT OF EXPENSES,**
_____) **AND CLASS REPRESENTATIVE**
ALL ACTIONS) **AWARDS**

_____) **DATE:** July 8, 2020
_____) **TIME:** 8:30 a.m.
_____) **JUDGE:** Hon. Sunshine S. Sykes
_____) **DEPT.:** 6

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2 I, C. Mario Jaramillo, Esq, hereby declare as follows:

3 1. I am the owner and managing attorney of C. Mario Jaramillo, A Professional Law
4 Corporation (dba Access Lawyers Group), one of the counsel for Plaintiffs and the Class in the
5 above-captioned action. Pursuant to the requirements of sections H.4. and H.5. of the Class Action
6 Case Management Order #1 ("CMO #1") entered in this matter on November 8, 2016 by the
7 Honorable Craig G. Riemer, I respectfully submit this Declaration in support of my firm's
8 application for an award of attorneys' fees in connection with services rendered in this case, as
9 well as the reimbursement of expenses incurred by my firm in connection with this litigation.
10 Except as otherwise noted, the facts set forth in this declaration are based in part upon my personal
11 knowledge, and I would competently testify to them if called upon to do so.

12 2. I have significant and extensive litigation experience, having been involved in
13 litigation since my admission to the bar in 1998.

14 3. The work done by my firm in this case includes, but is not limited to, initial factual
15 investigation; conducting legal research regarding Plaintiffs' potential claims; reviewing and/or
16 assisting with the drafting pleadings; client communications for the purposes of, among other
17 things, review of relevant facts, status of matter and strategy, and review of the Settlement
18 Agreement; corresponding with relevant parties (i.e. clients, co-counsel, opposing counsel, the
19 Court, etc., etc.); assisting Plaintiffs in gathering evidentiary materials; and helping preparing the
20 settlement-related documents and briefs.

21 4. My firm kept detailed records regarding the amount of time spent by my firm, and
22 the lodestar calculation based on my firm's current billing rates. The information was prepared
23 from contemporaneous, daily time records regularly prepared and maintained by my firm, true and
24 correct copies (redacted to remove privileged information) of which are attached hereto as **Exhibit**
25 **A.**

26 5. In summary, the total number of hours spent by my firm rendering services through
27 the date of this declaration, 30.4, multiplied by the current hourly rates of the attorneys and other

professionals equals \$13,680.00. These hours are broken down as follows:

Attorneys (P=partner; A=associate)	Hours	Rate	Lodestar
C. Mario Jaramillo, Esq. (P)	30.4	\$450.00	\$13,680.00

6. In my judgment, and based on my years of experience in class action litigation and other litigation, the number of hours expended, and the services performed by my firm, were reasonable and necessary for my firm's representation of Plaintiffs.

7. I have general familiarity with the range of hourly rates typically charged by plaintiffs' class action counsel in the geographical area where my firm practices and throughout the United States, both on a current basis and historically. From that basis, I am able to conclude that the rates charged by my firm are within the range of market rates charged by attorneys and professional staff of equivalent experience, skill and expertise for legal services furnished in complex contingency class action litigation, such as this.

8. Attached hereto as **Exhibit B** is my resume. I believe that the skill and experience described therein justify the rates charged. The rates reflect the risk undertaken due to contingency representation of the Plaintiffs given that the firm bore the risk of no payment at all for its services during this litigation. These rates have been approved by other courts as reasonable for contingency representations similar to that here. *See, e.g., [Khavarian vs Jerome's Furniture Warehouse, 37-2018-00065353-CU-BT-CTL (San Diego County Superior Court)]*.

9. The time described above does not include charges for expense items. I did not incur any out-of-pocket expenses in this case. 10. My firm takes seriously its duty to supervise the claims administration process, and therefore I anticipate my firm might continue to incur additional lodestar and/or expenses in connection with this litigation through the end of the claims administration process as necessary.

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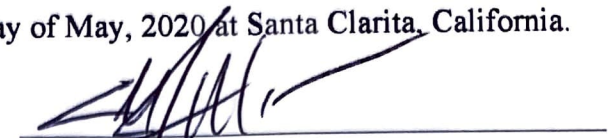
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DECL. OF C. MARIO JARAMILLO, ESQ. IN SUPPORT OF PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND CLASS REPRESENTATIVE AWARDS

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 21st day of May, 2020 at Santa Clarita, California.


C. MARIO JARAMILLO, ESQ.

EX. "A" - RENOVATE AMERICA TIMESHEET - C. MARIO JARAMILLO (CMJ)

Date	Description	Atty	Time	Hourly Rate	Total
5/31/16	Communication with client Ramos and clients mortgage banker regarding issues with Hero Program in relation to refinancing home, conduct research regarding the same.	CMJ	2.2	450.00	990.00
6/2/16	Discussion and communication with co counsel, Janine Pollack regarding possible class action case against Hero/ Renovate America.	CMJ	0.8	450.00	360.00
8/3/16	Discussion and communications with various potential class members regarding Hero/ Renovate America and potential claims.	CMJ	0.5	450.00	225.00
8/15/16	Continued communication/ review of documents regarding potential class members.	CMJ	0.3	450.00	135.00
9/30/16	Communication with co counsel, Pollack, Shalov, and Newman regarding facts of case.	CMJ	0.9	450.00	405.00
9/30/16	Communication with investigator regarding county records information needed to facts in	CMJ	0.3	450.00	135.00
10/3/16	Communications with client Loya regarding his experience with Hero/ Renovate America Program. Receive/ review documents from client.	CMJ	1.3	450.00	585.00
10/5/16	Communications with co counsel Newhall, Shalov, and Pollack regarding Loya.	CMJ	0.4	450.00	180.00
10/7/16	Communications with investigator regarding county records information.	CMJ	0.2	450.00	90.00
10/10/16	Continued communications with investigator regarding county records information.	CMJ	0.2	450.00	90.00
10/21/16	receive/review draft complaint from co counsel, Pollack.	CMJ	0.5	450.00	225.00
10/25/16	Communication with co counsel Pollack regarding complaint.	CMJ	0.2	450.00	90.00
10/26/16	Communication with client Ramos regarding complaint.	CMJ	0.4	450.00	180.00
10/28/16	Continued communications with co counsel Pollack regarding complaint.	CMJ	0.2	450.00	90.00
10/31/16	Continued communications with co counsel Pollack regarding complaint.	CMJ	0.3	450.00	135.00
10/31/16	Communication with client Loya regarding complaint.	CMJ	0.5	450.00	225.00
11/1/16	Communication with co counsel Pollack regarding final versions of complaint.	CMJ	0.4	450.00	180.00
11/30/16	Communication with co counsel Pollack regarding status of case and case developments since filing.	CMJ	0.2	450.00	90.00
12/2/16	Communications with co counsel Pollack regarding defendants request for extension of time to	CMJ	0.2	450.00	90.00
12/6/16	Communication with co counsel Pollack, and Rickert regarding status of case.	CMJ	0.5	450.00	225.00
12/7/16	Continued communication with co counsel Pollack regarding status of case.	CMJ	0.1	450.00	45.00
12/15/16	Communication with co counsel Pollack regarding schedule.	CMJ	0.1	450.00	45.00
12/21/16	Communications with co counsel Pollack, Newman, and Shalov regarding third party interest in case.	CMJ	0.4	450.00	180.00
12/22/16	Continued communications with counsel Pollack, Newman, and Shalov regarding third party interest in case as well as status of case.	CMJ	0.2	450.00	90.00
1/4/17	Communication with co counsel Pollack regarding status of motions on case.	CMJ	0.1	450.00	45.00
1/5/17	Continued communication with co counsel Pollack regarding pro hac vice filings.	CMJ	0.3	450.00	135.00
1/9/17	receive/ review notifications from court regarding pro hac vice filings.	CMJ	0.4	450.00	180.00
1/10/17	Communication with co counsel Pollack regarding press releases regarding the case, review release.	CMJ	0.2	450.00	90.00
1/12/17	receive/review notification from court regarding additional pro hac vice application.	CMJ	0.2	450.00	90.00
1/17/17	receive/ review notification from court regarding joinder and motion to dismiss case.	CMJ	0.3	450.00	135.00
1/23/17	receive/ review notice from court regarding motion to dismiss.	CMJ	0.3	450.00	135.00
1/24/17	receive/ review notice from court regarding certificate of interested parties.	CMJ	0.2	450.00	90.00
2/6/17	receive/ review notice from court regarding opposition to to consolidate case.	CMJ	0.3	450.00	135.00
2/7/17	Communication with co counsel Pollack, and Newman regarding new press releases on case.	CMJ	0.2	450.00	90.00
2/14/17	Communication with co counsel Pollack regarding amended complaint; Review amended complaint.	CMJ	0.7	450.00	315.00
2/15/17	Communication with co counsel Pollack and client Loya regarding amended complaint.	CMJ	0.3	450.00	135.00
2/16/17	receive/ review notification from court regarding filing of amended complaint.	CMJ	0.1	450.00	45.00
2/17/17	Continued communications with co counsel Pollack and client Loya regarding filing of amended	CMJ	0.1	450.00	45.00
2/21/17	Communications with co counsel Pollack and client Ramos regarding amended complaint.	CMJ	0.1	450.00	45.00
2/22/17	receive/ review notification from court regarding filing of Ramos amended complaint.	CMJ	0.2	450.00	90.00
2/24/17	receive/ review communications from court regarding Richardson first amended complaint.	CMJ	0.1	450.00	45.00
2/28/17	receive/ review communication from court regarding stipulation for order to set scheduling	CMJ	0.3	450.00	135.00
3/2/17	receive/ review notification from court regarding motion to dismiss amended complaint.	CMJ	0.3	450.00	135.00
3/8/17	receive/ review notification from court regarding joinder motion to dismiss first amended	CMJ	0.3	450.00	135.00
3/10/17	receive/ review continued notification from court regarding joinder motion to dismiss first amended complaint (multiple defendants).	CMJ	0.3	450.00	135.00
3/15/17	Communications with co counsel Pollack, receive/ review Amicus brief filed by Rocky Mountain	CMJ	0.5	450.00	225.00
3/28/17	Communications, receive/ review opposition to Amicus brief with co counsel Pollack	CMJ	0.4	450.00	180.00
4/3/17	receive/ review and reply to motions to dismiss request for judicial notice and oppositions to judicial	CMJ	0.3	450.00	135.00
4/28/17	receive/ review rule 26 disclosures from opposing counsel.	CMJ	0.2	450.00	90.00
5/1/17	communications with co counsel, Pollack and Newman regarding status of case.	CMJ	0.2	450.00	90.00
5/2/17	receive/ review notification from court regarding transcript order. Communications with co counsel, Pollack and Newman regarding status of case.	CMJ	0.4	450.00	180.00
7/18/17	receive/ review notification from court regarding order on motions, review order, communication with co counsel Pollack regarding status of case.	CMJ	0.7	450.00	315.00
7/21/17	Communications with co counsel Pollack regarding new press interest on case.	CMJ	0.1	450.00	45.00
7/24/17	Communications with co counsel Pollack, client Ramos, and Loya regarding recent order on case.	CMJ	0.2	450.00	90.00
7/26/17	Communications with co counsel Pollack and Rickert regarding co-ordination of cases.	CMJ	0.5	450.00	225.00
9/25/17	receive/ review notification from court regarding stipulation for judgment and waivers.	CMJ	0.1	450.00	45.00
10/13/17	receive/ review communications from court regarding judgment upon stipulation.	CMJ	0.2	450.00	90.00
2/15/18	Communications with co counsel Pollack regarding recent CMC.	CMJ	0.2	450.00	90.00

3/12/18	Communications with co counsel Pollack and clients regarding newly amended complaint.	CMJ	0.5	450.00	225.00
3/13/18	Communications with co counsel Pollack and Newman regarding additional amended complaints.	CMJ	0.4	450.00	180.00
3/14/18	Continued communications with co counsel Pollack and Newman regarding amended complaints	CMJ	0.3	450.00	135.00
3/15/18	Ongoing communications with co counsel Pollack regarding amended complaint.	CMJ	0.4	450.00	180.00
6/12/18	Communications with co counsel Pollack regarding tentative ruling on demurrer; review tentative.	CMJ	0.1	450.00	45.00
7/31/18	Communications with co counsel Pollack regarding my notice of appearance; work on the same.	CMJ	0.3	450.00	135.00
8/2/18	Finalize and send out my notice of appearance for filing.	CMJ	0.2	450.00	90.00
11/5/18	Communications with co counsel regarding upcoming mediation.	CMJ	0.1	450.00	45.00
11/19/18	receive/ review Mediation Brief from co counsel Pollack.	CMJ	0.5	450.00	225.00
12/11/18	receive/ review joint case management statement.	CMJ	0.1	450.00	45.00
12/14/18	receive/ review notice of entry of order	CMJ	0.1	450.00	45.00
2/8/19	receive/ review communications between co counsel Pollack and opposing counsel Boock regarding	CMJ	0.5	450.00	225.00
6/4/19	Communications with co counsel Pollack and Shalov regarding settlement term sheets; review term	CMJ	0.2	450.00	90.00
6/21/19	receive/ review email from opposing counsel Boock regarding draft notice of settlement, review	CMJ	0.1	450.00	45.00
7/3/19	receive/ review communications from opposing counsel Boock and co counsel Pollack regarding filed notice of conditional settlement.	CMJ	0.3	450.00	135.00
7/8/19	issues with filing of notice of settlement and stipulation to continue status conference received from court.	CMJ	0.8	450.00	360.00
9/20/19	receive/ review notice from court regarding vacating of status conference.	CMJ	0.1	450.00	45.00
10/29/19	receive/ review notice from court regarding status conference continued to 12/27/19.	CMJ	0.1	450.00	45.00
11/8/19	communications with co counsel Pollack regarding motion for preliminary approval of settlement.	CMJ	0.2	450.00	90.00
11/12/19	receive/ review and sign motion; communications with client Ramos and Loya regarding the same.	CMJ	0.4	450.00	180.00
12/28/19	receive/ review joint stipulation and proposed order to continue hearing regarding preliminary	CMJ	0.2	450.00	90.00
12/28/19	receive/ review communications from attorney Swiderski regarding Motion to Intervene.	CMJ	0.5	450.00	225.00
1/2/20	receive/ review additional communications from attorney Swiderski regarding complaint in	CMJ	0.3	450.00	135.00
1/8/20	receive/ review; communications with co counsel Pollack and attorney Swiderski regarding resolving issues regarding intervention	CMJ	0.4	450.00	180.00
1/15/20	support of settlement; communications with attorney Swiderski regarding withdrawal of intervention motion.	CMJ	0.3	450.00	135.00
1/21/20	receive/ review Notice of Appearance from law firm Hogan Lovells regarding objectors and	CMJ	0.7	450.00	315.00
1/22/20	Continued communications with co counsel Pollack, opposing counsel, objectors counsel, regarding resolution of objectors claims.	CMJ	0.4	450.00	180.00
2/5/20	Communications with co counsel Pollack regarding Amended Settlement Agreement; review, sign	CMJ	0.3	450.00	135.00
3/26/20	receive/ review communications from opposing counsel Boock regarding modification of settlement agreement filed with the court.	CMJ	0.2	450.00	90.00
5/8/20	review file; communication with client Ramos and Loya regarding revised settlement agreement.	CMJ	0.8	450.00	360.00
	TOTAL		30.4	450.00	13,680.00

EXHIBIT "B"

C. Mario Jaramillo, Esq., Founder of C. Mario Jaramillo, A Professional Law Corporation (dba Access Lawyers Group)

C. Mario Jaramillo, Esq., is an experienced relationship builder. During his first few years of practice, Mario worked at prominent California law firms, where he represented a multitude of clients. His caseload ranged from the simple to the complex; his clients from individuals to multi-national corporations.

As a result of his early legal experience, Mario was soon able to expand and open his own practice. Quickly, his practice grew, and his representation of clients became more focused on assisting individuals with personal claims and small businesses with general matters. Due to his small business knowledge, Mario became a panel member of the SCORE workshops for the L.A. Chamber of Commerce and regularly lectured small business owners on the pros/cons of owning their own business, as well as legal pitfalls to avoid.

Mario now consults both clients and attorneys in a variety of legal matters; including the quality and marketing of one's business/product/services. Mario's expertise is in spotting the legal issues faced by his clients and compiling of team of attorneys and support staff to best represent the client's interests and goals in the most efficient and economical manner. Attorneys and clients throughout California seek Mario's counsel in this regard and he has established longstanding relationships with clients and fellow attorneys as a result.