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**UNITED STATE DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ALFRED ZAKLIT AND ALFRED  
ZAKLIT, individually and on behalf of  
all others similarly situated,  
  
Plaintiffs,  
  
vs.  
  
NATIONSTAR MORTGAGE LLC  
and DOES 1 through 10, inclusive, and  
each of them,  
  
Defendants.

Case No 5:15-CV-02190-CAS-KK  
  
**CLASS ACTION**  
  
**DECLARATION OF ASAF  
AGAZANOF IN SUPPORT OF  
PLAINTIFF’S NOTICE OF  
MOTION & ATTORNEYS’ FEES  
AND INCENTIVE AWARD**

Assigned to the Hon.. Christina A. Snyder

**Date: August 19, 2019  
Time: 10:00 A.M.  
Place: Courtroom 8D  
Judge: Hon. Christina A. Snyder**

**DECLARATION OF ASAF AGAZANOF**

I Asaf Agazanof, declare:

1. I am one of the attorneys for the plaintiffs in this action, Alfred and Jessy Zaklit (“Plaintiffs”). I am an attorney licensed to practice law in the State of California since 2012. I have been continuously licensed in California since 2012 and am in good standing with the California State Bar. I have litigated cases in both state and federal courts in California.

2. The declaration is based upon my personal knowledge, except where expressly noted otherwise.

3. I submit this declaration in support of the Plaintiff’s Motion for Attorneys Fees and Costs and Incentive Award in the action against defendant, Nationstar Mortgage (“Nationstar” or “Defendant”).

**CLASS ACTION EXPERIENCE**

4. With respect to class actions specifically, a sampling of matters in which I have been appointed as class counsel is as follows:

- a. *Hattensty v. Bessire and Casenhiser, Inc. et. al.*, Los Angeles Superior Court, Case No. BC540657 (appointed as class counsel on behalf of on-site managers for unpaid wages)
- b. *Harrington, et. al. v. East Coast Foods, Inc.*, Los Angeles Superior Court, Case No. BC508879 (appointed as class counsel on behalf of non-exempt employees for unpaid wages)
- c. *Araiza, et. al v. The Scotts Company LLC*, Los Angeles Superior Court, Case No. BC570350 (appointed as class counsel on behalf of non-exempt employees for unpaid wages)
- d. *Esquivel v. Greatwide Dedicated Transport III, LLC, et. al.*, San Diego Superior Court, Case No. 37-2016-00012865 (appointed as class counsel on behalf of truck drivers for unpaid wages)

- e. *Lara v. K Partners Palmdale L.P., et. al.*, Los Angeles Superior Court, Case No. BC565599 (approved as class counsel for non-exempt housekeeping employees for unpaid wages)
- f. *Huguez, et. al v. KKW Trucking, Inc. et, al.*, Sacramento Superior Court, Case No. 34-2016-00190517 (appointed as class counsel on behalf of truck drivers for unpaid wages)
- g. *Landy et. al. v. Midway Rent a Car Inc, et. al.*, Los Angeles Superior Court, Case No. BC510734 [Consolidated] (approved as class counsel for non-exempt limousine drivers for unpaid wages)

**A. ASAF AGAZANOF ESQ. LODESTAR**

5. I have maintained contemporaneous time records since the commencement of this action. To date, I have incurred 155.6 hours of attorney time for this case, with a total lodestar of \$89,470. My billing rate is \$575 per hour in this case.

6. I Anticipate that I will incur an additional 10 hours for overseeing settlement administartion and the final approval process. Consequently, I am requesting a lodestar of \$95,220 for 165.6 of attorney time.

**B. ASAF AGAZANOF, ESQ. COSTS**

7. My firm has incurred litigation costs in this matter in the amount of \$533.32, for which my firm is seeking reimbursement. These costs are comprised of costs for hiring a translator to assist with deposition preparation, airfare to San Fransisco, and transportation costs. A breakdown of costs is as follows:

Description	Cost
Translator Costs	\$207.00
Airfare	\$228.00
Transportation to/from airport and court	\$98.32

**C. REASONABLENESS OF HOURLY RATES**

8. My hourly rates are reasonable in respect to the ranges charged by

1 comparable law firms in the State of California.<sup>1</sup> My billing rate is \$575 per hour in  
2 this case.

3 9. I completed my undergraduate studies at the University of California,  
4 Los Angeles, and graduated from this institution with a Bachelor of Arts degree in  
5 Psychology in June of 2009. I completed my legal studies at Loyola Law School in  
6 Los Angeles, California, where I received a Juris Doctor degree in May of 2012. I  
7 was actively involved in the Student Bar Association for my final two years at  
8 Loyola Law School. Moreover, I externed for the Honorable Gregory W. Alarcon  
9 and was a research assistant for Professor Allan Ides during law school.

10 10. Since being admitted to the State Bar of California in December of  
11 2012, I have exclusively practiced in the area of plaintiff-side civil litigation. I am a  
12 member of the Consumer Attorneys Association of Los Angeles (“CAALA”) and  
13 almost all of my work during my time in active legal practice has consisted of matters  
14 on behalf of Plaintiffs. Moreover, I currently have in excess of 5 pending class action  
15 cases.

16 11. In 2017, I was approved as class counsel, at an hourly billing rate  
17 of \$450 per hour in three class action matters that were granted final approval:

- 18 a. *Lara v. K Partners Palmdale L.P., et. al.*, Los Angeles Superior  
19 Court, Case No. BC565599 (granted final approval and motion  
20 for fees and approved at a rate of \$450 per hour)
- 21 b. *Huguez, et. al v. KKW Trucking, Inc. et, al.*, Sacramento  
22 Superior Court, Case No. 34-2016-00190517 (granted final  
23 approval and motion for fees and approved at a rate of \$450 per  
24 hour)
- 25 c. *Landy et. al. v. Midway Rent a Car Inc, et. al.*, Los Angeles  
26 Superior Court, Case No. BC510734 [Consolidated] (granted

27 <sup>1</sup> See Laffey Matrix attached hereto as Exhibit B.  
28

final approval and motion for fees and approved at a rate of \$450 per hour)

12. Attached hereto as Exhibit A is a true and correct list of my time entries.

13. Consequently, an hourly rate of \$575 is warranted, and is further warranted in light of customary rates on the Laffey Matrix.

14. I respectfully request the Court approve the Motion for Final Approval, the Motion for Attorneys' Fees, and Incentive Award.

I declare under penalty of perjury under the laws of California and the United States of America that the foregoing is true and correct, and that this declaration was executed on June 27, 2019.

By: /s/ Asaf Agazanof  
Asaf Agazanof, Esq.

# EXHIBIT A

Date	Task	Time
9/11/2015	Review case with lead counsel	0.3
9/11/2015	Review emails between lead counsel and opposing counsel	0.1
9/14/2015	Discuss case with lead counsel	0.3
9/15/2015	Discuss case with lead counsel	0.2
9/22/2015	Discuss case with lead counsel	0.3
9/29/2015	Review emails between lead counsel and opposing counsel	0.1
10/9/2015	Discuss case with lead counsel	0.3
10/15/2015	Convert call recordings to playable format and review call recordings	1
15-Oct	Review Transcripts of Plaintiffs	0.4
10/15/2015	Discuss case with Lead Counsel	0.5
10/15/2015	Review email correspondence	0.5
10/15/2015	Discuss facts, retainer agreement, and potential claims with clients	0.7
10/15/2015	Finalize draft of Retainer Agreement and send to clients	0.6
10/19/2015	Review correspondence with opposing counsel and lead counsel	0.2
10/21/2015	Discuss case with lead counsel	0.8
10/25/2015	Review Complaint	1
10/26/2015	Review notice of case assignment and standing order	0.4
12/19/2015	Review Defendant's Answer	1
12/20/2015	Review Docket	0.4
1/30/2015	Review Docket	0.3
2/18/2016	Review Rule 26F Report	0.4
2/19/2016	Receive, research, and discuss TCPA class notice with lead counsel and client and assist client	2
3/30/2016	Review Docket	0.1
4/7/2016	Discuss case, discovery, and upcoming deposition with clients and lead counsel	1
4/22/2016	Discuss case progress with lead counsel	0.5
5/1/2016	Review Defendant's Discovery responses and assist with drafting meet and confer letter	4
5/2/2016	Emails with lead counsel re: meet and confer letter	0.3
5/30/2016	Review Docket	0.3
6/10/2016	Review protective order	0.5
6/11/2016	Review order re: protective order	0.1
6/24/2016	Review revised protective order	0.2

7/12/2016 Discuss case with lead counsel	0.3
7/12/2016 Discuss case issues with client	0.3
7/12/2016 Email to Opposing Counsel	0.2
7/14/2016 Review correspondence between opposing counsel and lead counsel	0.4
7/26/2016 Review email correspondence	0.1
7/28/2016 Review email correspondence	0.1
7/28/2016 Review Docket	0.2
8/3/2016 Discuss deposition dates with lead counsel	0.3
8/3/2016 Contact clients regarding deposition dates	0.3
8/5/2016 emails with lead counsel re: client deposition dates	0.2
8/11/2016 Discuss document production with lead counsel	0.8
8/11/2016 Review Defendant's Discovery responses and document production	3
8/12/2016 Discuss case status, discovery, and upcoming depositions with lead counsel	1
8/14/2016 Assist with drafting joint stipulation	4
9/3/2016 Review email correspondence	0.1
9/9/2016 Discussion with client	0.4
9/20/2016 Correspond with lead counsel on issues related to the case	0.3
9/20/2016 Review Docket	0.3
9/25/2016 Correspond with lead counsel	0.1
9/25/2016 Review Docket and court order re: class certification deadline	0.2
10/13/2016 Review email correspondence between lead counsel and opposing counsel	0.3
10/13/2016 Discuss upcoming deposition with lead counsel	0.5
10/14/2016 Discuss upcoming deposition and prep with lead counsel	1.2
10/14/2016 Vet and obtain translator for upcoming deposition preparation	0.7
10/15/2016 Review Call Recordings	0.7
10/18/2016 Review Plaintiff's deposition notices	0.3
10/18/2016 Emails with lead counsel re: client deposition prep	0.3
10/18/2016 Make arrangements with clients for deposition preparation	0.4
10/21/2016 Assist with deposition preparation	3
10/21/2016 Discuss deposition preparation with lead counsel	0.5
10/21/2016 Follow up with clients and answer questions about upcoming deposition	0.5
11/6/2016 Review deposition transcripts	3



12/1/2016 Review Docket	0.2
12/10/2016 Review draft of class certification motion and do brief legal research	2
12/13/2016 Read and review motion for class certification and accompanying documents	5
1/23/2017 Review emails with lead counsel and opposing counsel	0.1
1/24/2017 correspond with lead counsel	0.1
1/27/2017 Discuss case with client	0.1
2/1/2017 Review Docket	0.3
2/9/2017 Discuss case with client	0.1
2/27/2017 Discuss case with client	0.2
3/1/2017 Review Docket	0.2
3/10/2017 Discuss case with client	0.1
3/20/2017 Read and review opposition to motion for class certification and accompanying documents	2.5
3/24/2017 Review email correspondence	0.1
3/26/2017 Discuss case with Lead Counsel	0.3
3/27/2017 Discuss case with Lead Counsel	0.2
3/27/2017 Discuss upcoming mediation with clients and answer questions	0.3
3/28/2017 Send follow up email to clients regarding upcoming mediation	0.2
3/29/2017 Review docket	0.2
3/29/2017 Draft and file notice of appearance	0.4
3/30/2017 Review stipulation to extend class briefing	0.3
3/30/2017 Review correspondence with opposing counsel and lead counsel	0.2
3/30/2017 Read and review reply brief in support of motion from class certification	2
4/14/2017 Discuss case with client	0.1
4/18/2017 Correspond with lead counsel on case issues	0.1
4/21/2017 Discuss upcoming mediation with lead counsel	0.2
5/24/2017 Provide client with status update	0.3
5/25/2017 Discuss client conversation with lead counsel	0.2
5/25/2017 Discuss case with client	0.1
5/26/2017 Discuss case with client	0.1
6/6/2017 Discuss upcoming mediation with lead counsel	0.5
6/7/2017 Draft Mediation brief	5.5

6/7/2017 Research for mediation brief	2
6/7/2017 Discuss upcoming mediation with lead counsel	0.5
6/8/2017 Discuss mediation with lead counsel	0.5
6/8/2017 Continue Drafting Mediation brief	2.3
6/9/2017 Review and revise mediation brief and discuss with lead counsel	1.5
6/13/2017 Review correspondence with lead counsel and mediator	0.2
6/15/2017 Review Defendant's mediation brief and correspond with lead counsel	3.5
6/20/2017 Discuss upcoming mediation with clients	0.1
6/20/2017 Prepare for upcoming mediation	2.5
6/21/2017 Travel to and from all-day mediation in San Francisco	14.5
6/22/2017 Discuss mediation outcome with clients	0.2
6/26/2017 Correspond with lead counsel about post-mediation discussions	0.2
7/10/2017 Review Defendant's reply memorandum	0.5
7/21/2017 Discuss class certification with lead counsel	0.5
7/23/2017 Prepare for certification hearing	2.5
7/24/2017 Travel to and Attend certification hearing	4.5
7/24/2017 Update clients on hearing results	0.3
7/26/2017 Review class certification order	1.5
8/9/2017 Review Defendant's 23(f) Petition	1.5
8/9/2017 Correspond with Lead Counsel regarding 23(f) petition	0.3
8/20/2017 Review 23(f) opposition	2
8/22/2017 Discuss case strategy with lead counsel	0.5
9/5/2017 Review email correspondence between lead counsel and opposing counsel	0.1
9/5/2017 Discuss case matters with clients	0.2
9/7/2017 Review correspondence between opposing counsel and lead counsel	0.1
9/7/2017 Review Bids for notice	0.4
9/13/2017 Review status report	0.2
9/19/2017 Review Court's Minutes	0.1
9/19/2017 Provide client with status update	0.2
9/27/2017 Review correspondence between opposing counsel and lead counsel	0.2
10/16/2017 Review notice from 9th Circuit	0.1
10/16/2017 Draft Status Report	0.6

10/16/2017	Discuss case with Lead Counsel	0.3
10/23/2017	Review correspondence between opposing counsel and lead counsel	0.2
11/20/2017	Provide client with status update	0.2
12/18/2017	Review Court's Minutes	0.2
11-Jan	Provide clients with status update and answer questions	0.2
2/1/2018	Review email correspondence to opposing counsel	0.2
2/2/2018	Review motion to notify class	0.3
2/7/2018	Review email correspondence between lead counsel and opposing counsel regarding mediation	0.2
2/16/2018	Review Response to motion to notify class	0.1
2/24/2018	Review reply in support of motion to notify class	0.1
3/6/2018	Discuss case with lead counsel	0.2
3/12/2018	Read Court's minutes on motion to notify class	0.1
4/15/2018	Review mediation brief	2.5
4/17/2018	Review Defendant's discovery responses	0.3
4/17/2018	Review emails with lead counsel	0.1
4/20/2018	Review mediation brief final draft and exhibits	0.5
4/24/2018	Review Defendant's mediation brief and do research	2
4/24/2018	Correspond with lead counsel	0.1
4/25/2018	Correspond with lead counsel	0.1
4/26/2018	Discuss upcoming mediation with client	0.1
4/26/2018	Conference call with mediator and lead counsel	0.3
4/26/2018	Prepare for mediation	2
4/27/2018	Attend mediation in Downtown Los Angeles	8
4/30/2018	Discuss mediation outcome with clients	0.1
4/30/2018	Review Status report	0.1
5/7/2018	Review emails between lead counsel and opposing counsel	0.1
5/8/2018	Further discuss mediation outcome with clients	0.2
5/9/2018	Review emails and stipulation from opposing counsel	0.2
5/15/2018	Review Court's Minutes	0.1
5/22/2018	Discuss case with Lead Counsel	0.2
5/29/2018	Discuss case with Lead Counsel	0.3
6/11/2018	Discuss case with Lead Counsel	0.3

6/22/2018	Review correspondence with lead counsel and opposing counsel	0.2
6/26/2018	Review correspondence with lead counsel and opposing counsel	0.1
6/28/2018	Review Court Docket	0.2
6/28/2018	Provide clients with status update	0.2
7/10/2018	Review Court's Minutes	0.1
7/17/2018	Review Docket	0.2
7/24/2018	Discuss case updates with lead counsel	0.1
9/9/2018	Discuss mediator proposal with lead counsel and clients	1
9/12/2018	Review notice of settlement	0.1
9/17/2018	Discuss settlement with lead counsel	0.2
11/5/2018	Discuss settlement progression with lead counsel	0.3
11/7/2018	Discuss case with clients	0.2
11/8/2018	Correspond with lead counsel	0.2
11/26/2018	Correspond with lead counsel re: settlement	0.1
12/10/2018	Review filed status report	0.1
12/14/2018	Review joint stipulation	0.1
12/17/2018	Review Docket	0.2
1/7/2019	Discuss case with Lead Counsel	0.3
1/7/2019	Review settlement agreement and discuss settlement agreement with clients	1.8
1/9/2019	Assist with drafting declarations and correspond with clients on long form settlement agreement	1.2
1/11/2019	Review preliminary approval motion and exhibits	2.2
1/18/2019	Review docket	0.2
2/4/2019	Review Docket	0.2
2/21/2019	Review Minute Order	0.1
2/25/2019	Review Minute Order	0.1
3/4/2019	Review Docket	0.2
3/5/2019	Provide clients with update	0.2
3/14/2019	Review correspondence between opposing counsel and lead counsel and class list	0.4
4/23/2019	Review weekly administration report and discuss with lead counsel	0.4
4/30/2019	Review weekly administration report and discuss with lead counsel	0.4
5/7/2019	Review weekly administration report and discuss with lead counsel	0.4
6/23/2019	Review Motion for final approval and motion for fees and costs draft	1.5

	6/24/2019 Draft Fee Declaration	1.5
	6/24/2019 Discuss Case with lead counsel	0.3
	6/25/2019 Calls with lead counsel	0.5
	6/25/2019 Assemble Hours Report	3
	6/25/2019 Provide clients with status update and answer questions	0.2
	6/25/2019 Assist clients with drafting declarations and obtaining signatures	1.2
	6/26/2019 Assemble Hours Report	5
	6/26/2019 Calls with lead counsel	0.5
	6/27/2019 Finalize declaration and hours report for filing	1
Various	Additional anticipated hours overseeing settlement administration and final approval	10
	TOTAL HOURS:	165.6
	TOTAL LODESTAR:	\$95,220

## EXHIBIT B

# LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598

6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *McDowell v. District of Columbia*, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001); *Salazar v. Dist. of Col.*, 123 F.Supp.2d 8 (D.D.C. 2000).

\* “Years Out of Law School” is calculated from June 1 of each year, when most law students graduate. “1-3” includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). “4-7” applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier “1-3” from June 1, 1996 until May 31, 1999, would move into tier “4-7” on June 1, 1999, and tier “8-10” on June 1, 2003.

\*\* The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.