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11 **Attorneys for Plaintiffs Pamela Carter, et al.**

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF ORANGE – CIVIL COMPLEX CENTER**

14 PAMELA CARTER, DEBORAH MARTIN,
15 CHRISTINE MORALES, STANLEY
16 CARAKER, STANLEY NICKS, MICHAELA
17 VECHT, BERT SCHORLING, JEANETTE
18 BREITEN, RAYMOND BACHAR,
19 KATHERINE MITCHELL, STEPHANIE
20 CASTRO, BRUCE HINSLEY, ARLENE
21 POUNDS, individually and as Representatives
22 of All Others Similarly Situated,

23 Plaintiffs,

24 vs.

25 STRATEGIC EQUITY GROUP;
26 CHRISTOPHER KRAMER; SHORELINE
27 CAPITAL, INC.; EDGEWATER CAPITAL,
28 LLC and DOES 1-100, inclusive,

Defendants.

Case No.:
30-2016-00866025-CU-BT-CXC

**DECLARATION OF ANTHONY W.
TRUJILLO IN SUPPORT OF
PLAINTIFFS' MOTION FOR AWARD OF
ATTORNEYS' FEES, LITIGATION
EXPENSES, AND SETTLEMENT
ADMINISTRATION COSTS**

Date:
Time: 1:30 p.m.
Dept: CX102
Judge: Hon. Peter J. Wilson

I, Anthony W. Trujillo, declare as follows:

1. I am an attorney licensed to practice law in the State of California and before this Court and a partner with Trujillo & Winnick, LLP.

2. I make this declaration in support of Plaintiffs' concurrently filed Motion for Award of Attorneys' Fees, Litigation Expenses, and Settlement Administration Costs and the Declaration of Jeffrey T. Belton, Esq. The following facts are within my personal knowledge and, if called as a witness herein, I could and would competently testify thereto.

1 3. I graduated from La Sierra University in 2002 and obtained a Bachelors of Science
2 in Business Administration: Finance.

3 4. I attended law school at Pepperdine University in Malibu, California. I graduated
4 in the top of my class with a Juris Doctorate, while also receiving a Certificate in Dispute
5 Resolution from the Straus Institute for Dispute Resolution. I graduated from Pepperdine Law
6 School in 2005 and have been member of the California bar since 2006

7 5. I also obtained a Masters in Business Administration from Pepperdine University's
8 Gradazio School of Business and Management in 2006.
9 After graduation, I began working for La Follette, Johnson, De Hass, Fesler & Ames in Santa Ana,
10 California where he obtained valuable experience with insurance defense litigation. I also gained
11 significant experience with real estate, employment, and business litigation while working for
12 Eskridge Law prior to co-founding his firm.

13 6. Beginning in January 2013, I co-founded Trujillo & Winnick, LLP with Alexander
14 H. Winnick, who has an extensive with litigating a variety of employment matters.

15 7. I have represented a wide array of clients in civil matters in state court. My practice
16 is considerably focused on employment litigation and complex bank cases. Trujillo & Winnick,
17 LLP consistently faces off against large banking entities, such as Wells Fargo and Bank of
18 America, and their determined and adept counsel. I have litigated or currently am litigating cases
19 involving wage-and-hour, discrimination and harassment, identity theft, California Rosenthal Fair
20 Debt Collections Practices Act claims, fraudulent conveyance, California Homeowers Bill of
21 Rights ("HBOR"), and foreclosure matters. I have recently litigated a wage-and-hour case with 15
22 defendants. I, along with Mr. Winnick, have litigated or currently am litigating numerous appeals
23 before the California Court of Appeals. I also have experience litigating shareholder derivative
24 actions and claims by shareholders against corporate officers and directors. This is my first ERISA
25 case, but I found that my skills and experience on my other cases translated well to working on
26 this case.

27 8. In this case, I worked extensively on the initial research, reviewing the financial
28 records at issue with the expert, drafting the complaint, communicating with opposing counsel Mr.

1 Balam, and appeared at a majority of the hearings. I have actively worked on the Federal Class
2 Action, which included the Defendants at the time, since the end of December 2015, and have
3 worked on this Action from its inception, including the drafting of the original Complaint, filed on
4 July 26, 2016. However, any billing showing my hours and time spent which I submit in support
5 of Class Counsel's Motion for Attorney's Fees was separated to include only work related to the
6 Defendants in this Action.

7 9. I further have excluded from my billing any time spent on this Motion for
8 Attorney's Fees and any anticipated time working with the Settlement Administrator or preparing
9 and attending the hearing for the Motion for Final Approval.

10 10. My time records in this case, **Exhibit 3** to the Belton Declaration, reflect a billing
11 rate of \$400 for the time period December 27, 2015 to the present.

12 11. I maintain, and charge when applicable, an hourly billing rate of \$400. I believe
13 that this rate is comparable to, if not below, other attorneys with my level of experience and skill
14 in the greater Los Angeles area and attorneys involved in class action litigation in California.

15 12. In the Federal Court Action, Hon. James V. Selna of the Central District Court, in
16 his Order Granting Plaintiffs' Motion for Class Action Settlement and Motion for Attorney Fees,
17 found that my reasonable hourly rate of \$400 to be reasonable. (A copy of Judge Selna's Order
18 Granting Plaintiff's Motion for Class Action Settlement and Motion for Attorney Fees is attached
19 as Exhibit A to the Request for Judicial Notice, filed concurrently with Plaintiffs' Motion and this
20 Declaration). (RJN, ¶ 1, Exhibit A, pgs. 17-18).

21 13. Attorney Belton has collected all expenses incurred by me in the litigation in his
22 Declaration and in the Motion, and the amount claimed in expenses by Class Counsel is a true and
23 correct accounting.

24 14. Trujillo & Winnick took this case on a contingent basis. This case was a risk for
25 our law firm. I believe Class Counsel has obtained an excellent result in this case, based on the
26 payouts to the Class Members and the risks and costs involved in pursuing the claims.

27 15. I believe Class Counsel has obtained an excellent result in this case, based on the
28 payouts to the Class Members and the risks and costs involved in pursuing the claims. I concur

1 with the statements in this and all regards made in the declarations of attorneys Belton and
2 Winnick.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct. Executed on this 6th day of March 2019 at Santa Monica, California.

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7 March 6, 2019

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By:



Anthony W. Trujillo

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