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8 *Attorneys for Plaintiff and Proposed Class*

9 UNITED STATES DISTRICT COURT  
10  
11 NORTHERN DISTRICT OF CALIFORNIA

12 JUAN ALCAZAR and PAMELA WILLIAMS,  
13 individually and on behalf of all others similarly  
14 situated,

15 Plaintiffs,

16 v.

17 MIELE, INCORPORATED, a Delaware  
18 corporation; and Does 1 to 10, inclusive,

19 Defendants.

Case No. 3:20-cv-02890-VC

*Honorable Vince Chhabria*

**DECLARATION OF THIAGO M.  
COELHO IN SUPPORT OF JOINT  
MOTION FOR: (1) PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT; AND (2) CONDITIONAL  
CERTIFICATION OF SETTLEMENT  
CLASSES**

Date: December 2, 2021  
Time: 10:00 AM  
Courtroom: 4 - 17<sup>th</sup> Floor

1 I, Thiago M. Coelho, declare as follows:

2 1. I am an attorney with Wilshire Law Firm, PLC, and I am licensed to practice law in all  
3 courts in the State of California. I have personal knowledge of the following, and if called as a witness,  
4 could and would testify competently thereto.

5 2. I am a graduate of the University of Southern California Law School, and I have  
6 devoted the vast majority of my years of practice to defending disabled persons and consumers in class  
7 action litigation. I currently serve as President of The Data Privacy Trial Lawyers Association – Top  
8 10. I have represented countless Plaintiffs in ADA and Unruh Act litigation deriving from the failure  
9 of websites to be accessible to persons with visual disabilities, and I have learned to accurately judge  
10 the merits of their cases. I have prosecuted over a hundred such cases, many of them to positive  
11 settlements requiring defendants to permanently fix their websites. This is a strong settlement for our  
12 case.

13 3. I have reviewed the settlement in this case, and I find it to be fair, adequate and  
14 reasonable. There were several risks to this case that could have prevented any monetary recovery  
15 whatsoever, and any injunctive relief, including the risk that the Court would find that the website  
16 worked well enough with screen-reading software to satisfy the ADA, and the risk that the Court  
17 would deny class certification. Here, the Class is being awarded real relief, in the form of injunction  
18 that will fully remedy the site’s deficiencies. The settlement is in the best interest of the class members.

19 I declare under penalty of perjury under the laws of the State of California and the United  
20 States that the foregoing is true and correct.

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22 Executed this 1<sup>st</sup> day of November, 2021, at Los Angeles, California.

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*/s/ Thiago M. Coelho*

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Thiago M. Coelho

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