

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

ZACHARY HUDSON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

OATRIDGE SECURITY GROUP, INC., a
Washington corporation; and CY A.
OATRIDGE, individually and on behalf of
the marital community composed of Cy and
J. Doe OATRIDGE,

Defendants.

No. 18-2-23611-8 SEA

DECLARATION OF ADAM J.
BERGER IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND PETITION FOR
ATTORNEYS' FEES

I, ADAM J. BERGER, am one of the attorneys previously designated as counsel for
the class in this action.

1. In accordance with the Court's January 12, 2021 Order, third party
administrator ILYM Group, Inc. mailed and emailed notice of settlement to the class
members on February 11, 2021 with a text message reminder, where possible, seven days

1 later. The notice included a March 15 deadline for submission of objections and, for newly
2 added class members, to request exclusion from the class.

3 2. To date, no class member has communicated an objection to the proposed
4 settlement and no newly added class member has requested exclusion.

5 3. The notice to the class included a description of the attorneys' fee and cost
6 award requested by Class Counsel of 30% of the gross settlement fund, or \$525,000, plus
7 approximately \$25,000 in costs. No class member has yet objected to the requested award.

8 4. Following the Court's Preliminary Approval Order, Defendants produced
9 additional, updated pay and time data to Plaintiff, permitting more precise allocation of
10 damages to class members who worked toward the end of the class period. Plaintiff incurred
11 additional expert expenses to analyze this data, which caused Class Counsel's total litigation
12 costs to reach \$26,361.89, slightly in excess of the \$25,000 projected at the time of
13 preliminary approval.

14 5. Appended hereto are itemized reports of the costs actually incurred by Class
15 Counsel in litigation of this case, including costs incurred by Elizabeth Hanley's former law
16 firm, Reed Longyear (Exhibit 1), Schroeter Goldmark & Bender (Exhibit 2), and Terrell
17 Marshall Law Group (Exhibit 3). The costs and advances incurred by the three firms to date
18 total \$26,361.89.
19
20
21

22 I declare under penalty of perjury under the laws of the State of Washington that the
23 foregoing is true and correct.
24
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DATED at Seattle, Washington, this 1st day of March, 2021.

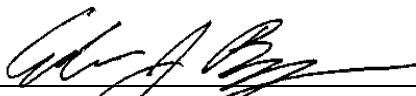

ADAM J. BERGER, WSBA #20714
Counsel for Plaintiff

EXHIBIT 1

Client ID 9362.001 HUDSON/ZACHARY

Trans Date	B C Code	Tcode/ Tmkr	C T	Task	Stmt # Rate	Hours to Bill	Amount
09/20/2018	EAH	0 L140		E101	0.150		2.70
09/20/2018	EAH	0 L140		E101	0.150		0.90
09/20/2018	EAH	0 L140		E101	0.150		3.90
10/15/2018	EAH	0 L140		E101	0.150		0.45
10/15/2018	EAH	0 L140		E101	0.150		0.45
10/22/2018	EAH	0 L140		E101	0.150		1.20
02/26/2019	EAH	0 L140		E101	0.150		2.70
02/26/2019	EAH	0 L140		E101	0.150		0.45
02/26/2019	EAH	0 L140		E101	0.150		4.20
02/26/2019	EAH	0 L140		E101	0.150	51.00	Reprographic
02/26/2019	EAH	0 L140		E101	0.150		0.60
02/26/2019	EAH	0 L140		E101	0.150		0.15
02/26/2019	EAH	0 L140		E101	0.150		0.45
04/15/2019	EAH	3 L140		E108			0.65
04/15/2019	EAH	0 L140		E101	0.150		0.90
04/15/2019	EAH	0 L140		E101	0.150		0.90
04/29/2019	EAH	0 L140		E101	0.150		0.60
05/16/2019	EAH	0 L140		E101	0.150		2.55
05/16/2019	EAH	0 L140		E101	0.150		2.40
06/03/2019	EAH	0 L140		E101	0.150		7.54
06/20/2019	EAH	0 L140		E101	0.150		0.60
06/20/2019	EAH	0 L140		E101	0.150		4.35
06/25/2019	EAH	0 L140		E101	0.150		4.35
07/08/2019	EAH	0 L140		E101	0.150		4.35
07/08/2019	EAH	0 L140		E101	0.150		0.60
07/22/2019	EAH	0 L140		E101	0.150		1.65
08/07/2019	EAH	0 L140		E101	0.150		0.78
08/07/2019	EAH	0 L140		E101	0.150		0.78
08/12/2019	EAH	0 L140		E101	0.150		1.80
08/26/2019	EAH	0 L140		E101	0.150		1.50
09/20/2019	EAH	0 L140		E101	0.150		4.35
09/20/2019	EAH	0 L140		E101	0.150		6.15
09/24/2019	EAH	0 L140		E101	0.150		1.80
09/25/2019	EAH	3 L140		E108			0.80
09/25/2019	EAH	0 L140		E101	0.150		0.45
09/30/2019	EAH	0 L140		E101	0.150		50.25
09/30/2019	EAH	0 L140		E101	0.150		100.50
09/30/2019	EAH	0 L140		E101	0.150		50.40
09/30/2019	EAH	0 L140		E101	0.150		5.40
09/30/2019	EAH	0 L140		E101	0.150		1.80
09/30/2019	EAH	0 L140		E101	0.150		50.25
09/30/2019	EAH	0 L140		E101	0.150		25.20
09/30/2019	EAH	0 L140		E101	0.150		50.25
10/02/2019	EAH	3 L140		E108			1.15
10/02/2019	EAH	0 L140		E101	0.150		0.45
10/02/2019	EAH	0 L140		E101	0.150		3.90
10/02/2019	EAH	0 L140		E101	0.150		4.35

10/06/2019	EAH	0	L140	E101	0.150	0.75
10/06/2019	EAH	0	L140	E101	0.150	0.90
10/06/2019	EAH	0	L140	E101	0.150	0.75
10/06/2019	EAH	0	L140	E101	0.150	0.75
10/08/2019	EAH	0	L140	E101	0.150	0.90
10/11/2019	EAH	0	L140	E101	0.150	0.45
11/27/2019	EAH	0	L140	E101	0.150	1.20
11/27/2019	EAH	0	L140	E101	0.150	0.45
12/03/2019	EAH	0	L140	E101	0.150	0.45
12/03/2019	EAH	0	L140	E101	0.150	1.95
12/03/2019	EAH	0	L140	E101	0.150	3.75
12/03/2019	EAH	0	L140	E101	0.150	1.20
12/03/2019	EAH	0	L140	E101	0.150	0.45
12/03/2019	EAH	0	L140	E101	0.150	3.45
12/03/2019	EAH	0	L140	E101	0.150	1.80
12/03/2019	EAH	0	L140	E101	0.150	22.35
12/03/2019	EAH	0	L140	E101	0.150	7.35
12/03/2019	EAH	0	L140	E101	0.150	0.75
12/03/2019	EAH	0	L140	E101	0.150	0.45
12/03/2019	EAH	0	L140	E101	0.150	1.80
12/03/2019	EAH	0	L140	E101	0.150	3.75
12/03/2019	EAH	0	L140	E101	0.150	1.95
12/03/2019	EAH	0	L140	E101	0.150	0.45
12/03/2019	EAH	0	L140	E101	0.150	0.45
12/03/2019	EAH	0	L140	E101	0.150	1.20
12/03/2019	EAH	0	L140	E101	0.150	1.50
12/03/2019	EAH	0	L140	E101	0.150	0.45

Client ID 9362.001 HUDSON/ZACHARY

<u>Trans</u> <u>Date</u>	<u>B C</u> <u>Code</u>	<u>Tcode/ Tmkr</u> _ _	<u>C T</u> _ _	<u>Task</u>	<u>Stmt # Rate</u>	<u>Hours to</u> <u>Bill</u>	<u>Amount</u>
12/03/2019	EAH	0	L140	E101	0.150	1.65	Reprographic
12/03/2019	EAH	0	L140	E101	0.150		1.95
12/04/2019	EAH	0	L140	E101	0.150		1.95
12/04/2019	EAH	0	L140	E101	0.150		1.80
12/04/2019	EAH	0	L140	E101	0.150		3.75
12/04/2019	EAH	0	L140	E101	0.150		3.15
12/04/2019	EAH	0	L140	E101	0.150		1.95
12/04/2019	EAH	0	L140	E101	0.150		1.95
12/20/2019	EAH	0	107		0.150		7.50
12/20/2019	EAH	0	107		0.150		3.90

Client ID 9362.001 HUDSON/ZACHARY

Subtotal for Expenses					Billable	0.00	554.10	
09/20/2018	EAH	0	L100	E112			241.00	
10/02/2018	EAH	0	L140	E107			95.00	
10/02/2018	EAH	0	L140	E107			60.00	
03/10/2019	EAH	0	L330	E115			381.02	
09/17/2019	EAH	0	L140	E107			79.95	
11/27/2019	EAH	0	L140	E112			22.49	

Subtotal for Advances

Billable

0.00

879.46

Reprographic Charges, 18 copies

Reprographic Charges, 6 copies
Reprographic Charges, 26 copies
Reprographic Charges, 3 copies
Reprographic Charges, 3 copies
Reprographic Charges, 8 copies
Reprographic Charges, 18 copies
Reprographic Charges, 3 copies
Reprographic Charges, 28 copies

Charges, 340 copies

Reprographic Charges, 4 copies
Reprographic Charges, 1 copies
Reprographic Charges, 3 copies

Postage

Reprographic Charges, 6 copies
Reprographic Charges, 6 copies
Reprographic Charges, 4 copies
Reprographic Charges, 17 copies
Reprographic Charges, 16 copies
Reprographic Charges, 29 copies
Reprographic Charges, 4 copies
Reprographic Charges, 29 copies
Reprographic Charges, 29 copies
Reprographic Charges, 29 copies
Reprographic Charges, 4 copies
Reprographic Charges, 11 copies
Reprographic Charges, 3 copies
Reprographic Charges, 3 copies
Reprographic Charges, 12 copies
Reprographic Charges, 10 copies
Reprographic Charges, 29 copies
Reprographic Charges, 41 copies
Reprographic Charges, 12 copies

Postage

Reprographic Charges, 3 copies
Reprographic Charges, 335 copies
Reprographic Charges, 670 copies
Reprographic Charges, 336 copies
Reprographic Charges, 36 copies
Reprographic Charges, 12 copies
Reprographic Charges, 335 copies
Reprographic Charges, 168 copies
Reprographic Charges, 335 copies

Postage

Reprographic Charges, 3 copies
Reprographic Charges, 26 copies
Reprographic Charges, 29 copies

Reprographic Charges, 5 copies
Reprographic Charges, 6 copies
Reprographic Charges, 5 copies
Reprographic Charges, 5 copies
Reprographic Charges, 6 copies
Reprographic Charges, 3 copies
Reprographic Charges, 8 copies
Reprographic Charges, 3 copies
Reprographic Charges, 3 copies
Reprographic Charges, 13 copies
Reprographic Charges, 25 copies
Reprographic Charges, 8 copies
Reprographic Charges, 3 copies
Reprographic Charges, 23 copies
Reprographic Charges, 12 copies
Reprographic Charges, 149 copies
Reprographic Charges, 49 copies
Reprographic Charges, 5 copies
Reprographic Charges, 3 copies
Reprographic Charges, 12 copies
Reprographic Charges, 25 copies
Reprographic Charges, 13 copies
Reprographic Charges, 3 copies
Reprographic Charges, 3 copies
Reprographic Charges, 8 copies
Reprographic Charges, 10 copies
Reprographic Charges, 3 copies

Charges, 11 copies

Reprographic Charges, 13 copies
Reprographic Charges, 13 copies
Reprographic Charges, 12 copies
Reprographic Charges, 25 copies
Reprographic Charges, 21 copies
Reprographic Charges, 13 copies
Reprographic Charges, 13 copies
Reprographic Charges, 50 copies
Reprographic Charges, 26 copies

Class Action Complaint Filing Fee - King County Superior Court Clerk
Service at 12319 Osprey Dr NW Gig Harbor - Legal Servers Inc
Service on Oatridge Security Group - Legal Servers Inc
Zachary Hudson Deposition Transcript - Byers & Anderson
Delivery services/messengers - ABC Legal Messengers
Working Copies - King County Superior Court

EXHIBIT 2



Zachary Hudson
603 22nd St. SE
Auburn, WA 98002

Date: February 24, 2021
Account No. 23241-4900
Page: 1

Hudson, Zachary v. Oatridge Security Group

Expenses

Postage	5.10
Total Expenses	<u>\$5.10</u>

Advances

01/27/2020	Cy Oatridge (Deposition)	2,696.61
03/16/2020	Karen A. Heerensperger (Expert - Other)	216.00
05/11/2020	Karen A. Heerensperger (Expert - Other)	108.00
06/29/2020	Karen A. Heerensperger (Expert - Other)	175.50
08/14/2020	King County Superior Court Clerk (Certified/Working Copies)	21.00
08/25/2020	Karen A. Heerensperger (Expert - Other)	337.50
08/25/2020	Judicial Dispute Resolution, LLC (Legal Expert)	1,515.00
10/12/2020	Karen A. Heerensperger (Expert - Other)	108.00
10/26/2020	Jeff Munson, PhD (Medical Expert)	6,518.75
10/26/2020	Judicial Dispute Resolution, LLC (Legal Expert)	725.00
10/29/2020	eDiscovery Inc. (Expert - Other)	250.00
12/03/2020	King County Superior Court Clerk (Certified/Working Copies)	21.00
01/25/2021	Jeff Munson, PhD (Medical Expert)	2,800.00
	Total Advances	<u>\$15,492.36</u>
	Total Current Work:	\$15,497.46

Balance Due:

\$15,497.46



EXHIBIT 3

Terrell Marshall Law Group PLLC

Hudson, Zachary
Matter ID 2179-001
Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
Component: Courier/PS						
354281	08/29/2019		Courier/Process Server	1.00	39.95	39.95
366758	01/30/2020		Courier/Process Server	1.00	39.95	39.95
374353	04/23/2020		Courier/Process Server	1.00	39.95	39.95
				Component: Courier/PS	<u>3.00</u>	<u>119.85</u>
Component: Expert						
389728	10/21/2020		Expert	1.00	6,518.75	6,518.75
				Component: Expert	<u>1.00</u>	<u>6,518.75</u>
Component: Filing Fee						
347522	06/13/2019		Filing Fees	1.00	22.49	22.49
357737	10/15/2019		Filing Fees	1.00	22.49	22.49
358023	10/18/2019		Filing Fees	1.00	22.49	22.49
358400	10/23/2019		Filing Fees	1.00	22.49	22.49
361915	12/03/2019		Filing Fees	1.00	22.49	22.49
				Component: Filing Fee	<u>5.00</u>	<u>112.45</u>
Component: Mediation						
387501	09/30/2020		Mediation Fees	1.00	1,515.00	1,515.00
389729	10/21/2020		Mediation Fees	1.00	725.00	725.00
				Component: Mediation	<u>2.00</u>	<u>2,240.00</u>

Terrell Marshall Law Group PLLC

Hudson, Zachary
Matter ID 2179-001
Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
Component: Parking						
338270	02/28/2019		Parking	1.00	14.00	14.00
358026	10/01/2019		Parking	1.00	10.30	10.30
363329	12/20/2019		Parking	1.00	55.78	55.78
				Component: Parking		
				3.00		80.08
Component: Postage						
358015	10/18/2019		Postage	1.00	1.15	1.15
368016	02/18/2020		Postage	1.00	34.00	34.00
370637	03/18/2020		Postage	1.00	21.00	21.00
				Component: Postage		
				3.00		56.15
Component: Record Req						
341350	04/12/2019		Records Requests	1.00	1.25	1.25
				Component: Record Req		
				1.00		1.25
Component: Transcript						
338496	03/11/2019		Transcripts	1.00	190.51	190.51
				Component: Transcript		
				1.00		190.51
Component: Westlaw						
322944	08/22/2018		Westlaw charges	1.00	4.56	4.56
335334	01/13/2019		Westlaw charges	1.00	0.90	0.90
335335	01/27/2019		Westlaw charges	1.00	0.06	0.06

Terrell Marshall Law Group PLLC

Hudson, Zachary
Matter ID 2179-001
Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
338046	02/05/2019		Westlaw charges	1.00	0.11	0.11
338047	02/27/2019		Westlaw charges	1.00	2.34	2.34
340719	03/01/2019		Westlaw charges	1.00	0.45	0.45
340720	03/02/2019		Westlaw charges	1.00	0.38	0.38
340721	03/03/2019		Westlaw charges	1.00	1.42	1.42
340722	03/04/2019		Westlaw charges	1.00	0.19	0.19
348932	06/04/2019		Westlaw Charges	1.00	0.09	0.09
348933	06/05/2019		Westlaw Charges	1.00	0.48	0.48
348929	06/18/2019		Westlaw Charges	1.00	2.10	2.10
348930	06/19/2019		Westlaw Charges	1.00	2.39	2.39
348931	06/27/2019		Westlaw Charges	1.00	1.21	1.21
359623	09/13/2019		Westlaw Charges	1.00	0.80	0.80
359624	09/18/2019		Westlaw Charges	1.00	1.10	1.10
359625	09/19/2019		Westlaw Charges	1.00	12.11	12.11
359626	10/02/2019		Westlaw Charges	1.00	1.10	1.10
359627	10/03/2019		Westlaw Charges	1.00	0.30	0.30
359628	10/04/2019		Westlaw Charges	1.00	0.15	0.15
359629	10/07/2019		Westlaw Charges	1.00	0.15	0.15
359622	10/09/2019	TJM	Westlaw Charges	1.00	3.29	3.29
359630	10/10/2019		Westlaw Charges	1.00	6.79	6.79

Terrell Marshall Law Group PLLC

Hudson, Zachary
Matter ID 2179-001
Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
359631	10/11/2019		Westlaw Charges	1.00	1.92	1.92
359634	10/11/2019		Westlaw Charges	1.00	2.48	2.48
359632	10/21/2019		Westlaw Charges	1.00	0.15	0.15
359633	10/22/2019		Westlaw Charges	1.00	0.15	0.15
362059	11/14/2019		Westlaw Charges	1.00	3.41	3.41
362060	11/15/2019		Westlaw Charges	1.00	0.43	0.43
362061	11/17/2019		Westlaw Charges	1.00	1.25	1.25
362062	11/18/2019		Westlaw Charges	1.00	0.14	0.14
362054	11/21/2019	TJM	Westlaw Charges	1.00	3.23	3.23
362055	11/22/2019	TJM	Westlaw Charges	1.00	0.43	0.43
362063	11/22/2019		Westlaw Charges	1.00	0.86	0.86
362056	11/25/2019	TJM	Westlaw Charges	1.00	2.02	2.02
362057	11/26/2019	TJM	Westlaw Charges	1.00	15.08	15.08
362058	11/27/2019	TJM	Westlaw Charges	1.00	1.01	1.01
366896	01/14/2020		Westlaw Charges	1.00	0.32	0.32
380904	03/02/2020		Westlaw Charges	1.00	10.31	10.31
374951	04/13/2020		Westlaw Charges	1.00	2.94	2.94
374953	04/13/2020		Westlaw Charges	1.00	1.44	1.44
374952	04/14/2020		Westlaw Charges	1.00	9.21	9.21
374954	04/14/2020		Westlaw Charges	1.00	1.15	1.15

Terrell Marshall Law Group PLLC

Hudson, Zachary
 Matter ID 2179-001
 Costs Report

Trans No	Date	Prof	Narrative	Units	Price	Value
381256	05/21/2020		Westlaw Charges	1.00	4.23	4.23
383260	07/24/2020		Westlaw Charges	1.00	5.44	5.44
383261	07/29/2020		Westlaw Charges	1.00	1.76	1.76
				Component: Westlaw		
						<u>111.83</u>
				Grand Total:	65.00	\$9,430.87