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14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA
16 WESTERN DIVISION

17 JIMMY BANH et al., on behalf of
18 themselves and all others similarly
19 situated,

20 Plaintiffs,

21 v.

22 AMERICAN HONDA MOTOR CO.,
23 INC, a California corporation,
24

25 Defendant.
26
27
28

Case No.: 2:19-cv-5984 RGK (ASx)

**DECLARATION OF ROBERT A.
CURTIS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS**

1 I, Robert A. Curtis, declare and state as follows:

2 1. I am the Managing Partner of the law firm of Foley Bezek Behle & Curtis,
3 LLP (“FBB&C”), a California law firm with principal offices in Santa Barbara and
4 Costa Mesa. I submit this declaration in support of Plaintiffs’ Motion for Attorney Fees,
5 Costs, and Service Awards.

6 2. I am a member in good standing of the California State Bar, and I have
7 never been the subject of any type of disciplinary proceeding. I am admitted to practice
8 before all California state courts, and, as relevant here, the United States District Courts
9 for the Central, Northern, Eastern and Southern Districts of California, and the Ninth
10 Circuit Court of Appeals. I regularly practice in the Central District of California,
11 Western Division.

12 3. I graduated from the University of California at Los Angeles with a B.S. in
13 1996 and received my law degree from Pepperdine University School of Law in 1999.
14 Upon graduating from law school, I was hired full time at Foley Bezek & Komoroske,
15 LLP (the former name of my current firm) and became a partner in January 2003. I was
16 admitted to the California Bar in 1999. Over the past sixteen years, the primary focus of
17 my practice has been complex business litigation and class actions. I, in conjunction
18 with other partners at the firm, have litigated cases that have resulted in over \$760
19 million in settlements and verdicts against some of the largest companies and biggest
20 law firms in the country. Since 2011, I have maintained the rating of “AV – Preeminent”
21 from Martindale Hubble. I have also been recognized as a “Rising Star” in the 2008,
22 2009, 2010, 2011, 2012, 2013, and 2014 editions of the Super Lawyers publication. In
23 each of the last five years, I was designated as a Super Lawyer and last year recognized
24 as an Elite Trial Lawyer Finalist by the National Law Journal.

25 4. During the past twenty-two years, my partners and I collectively have been
26 involved in the representation of plaintiffs in more than 25 different class action cases,
27 including in Central District of California. During that time, I have had significant

1 involvement with, and have served as lead or co-lead counsel in, a number of major
2 class actions which were settled in a manner that resulted in substantial, material
3 benefits for various classes of wronged individuals. Two such cases that my firm
4 litigated and settled in the Central District of California are:

5 (a) Lozano v. AT&T Wireless Services, Inc., et al., U.S. District Court,
6 Central District of California, Case No. CV02-90-AHS(AJWx), which resulted in a
7 potential recovery for the class of more than \$42 million;

8 (b) Stern v. AT&T Mobility Corporation, et al., U.S. District Court,
9 Central District of California, Case No. CV05-08842-CAS(Ctx), which resulted in a
10 potential recovery for the class of more than \$38 million.

11 5. I am familiar with both firms that are serving as Class Counsel in the above-
12 captioned matter. It is my opinion that both firms have an excellent reputation for their
13 work in the field of complex civil litigation and class actions.

14 6. I have reviewed the hourly rates requested by Class Counsel in the above
15 captioned matter and, given Class Counsel's experience, reputation, and ability, I
16 believe these rates to be reasonable and in line with rates charged by attorneys of
17 comparable experience, reputation, and ability for similar work in the Central District
18 of California, Western Division.

19 7. Based upon my previous experience requesting awards of attorney fees in
20 the Central District of California, I have always included, and have received, non-
21 discounted compensation for my travel time.

22 8. I am not being compensated for providing this declaration.

23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed this 1st day of November, 2021.

25 /s/ Robert A. Curtis
26 Robert A. Curtis