

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
27
28

Douglas J. Campion (SBN 75381)
THE LAW OFFICES OF DOUGLAS J. CAMPION, APC
17150 Via Del Campo, Suite 100
San Diego, CA 92127
Telephone: (619) 299-2091
Email: doug@djcampion.com

James O. Lattuner
EDELMAN COMBS LATTURNER & GOODWIN, LLC
20 S. Clark Street, Suite 1500
Chicago, Illinois 60603
Telephone: (312) 739-4200
Email: info@edcombs.com

Attorneys for Plaintiffs and the Settlement Class

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

<p>IN RE: MIDLAND CREDIT MANAGEMENT, INC., TELEPHONE CONSUMER PROTECTION ACT LITIGATION</p>	<p>Case No. 11-md-2286-MMA (MDD) Member cases: 10-cv-02261 10-cv-02600 10-cv-02368 10-cv-02370</p> <p><u>CLASS ACTION</u> SUPPLEMENTAL DECLARATION OF DOUGLAS J. CAMPION IN SUPPORT OF PLAINTIFFS' COUNSEL'S MOTION FOR ATTORNEYS' FEES, APPROVAL OF COSTS AND FOR INCENTIVE PAYMENTS Date: Aug. 23, 2016 Time: 2:00 p.m. Judicate West 405 West Broadway, Suite 2400 San Diego, CA 92101</p>
--	--

1 I, Douglas J. Campion, declare:
2

3 1. I am one of the attorneys for the Plaintiffs, Christopher Robinson
4 (“Robinson”), Eduardo Tovar (“Tovar”), and Dave Scardinia (“Scardinia”), in this
5 action (“Midland MDL”), and co-lead counsel in this action. I submit this
6 supplemental declaration in support of the Motion for Attorneys’ Fees and Approval
7 of Costs, and For Incentive Payments to advise the Court of the additional attorneys’
8 fees that have been incurred since the previous filing of declarations in March, 2016
9 by the Plaintiffs’ counsel for those three Plaintiffs. I am licensed to practice law in
10 California and this Court as well as all federal courts in this state. If called as a
11 witness, I would competently testify to the matters herein from personal knowledge.

12 2. In my prior declaration, I summarized the total hours incurred by the
13 class representatives’ firms over the course of the litigation through the time of
14 filing those declarations. As of that date, March, 22, 2016, that lodestar incurred by
15 the attorneys representing the three class representative plaintiffs was \$1,322,760.
16 Based upon the \$2,400,000 in fees sought, that represented a multiplier of
17 approximately 1.81.

18 3. Since the date of filing that declaration with the motion for fees and
19 costs almost five months ago, the firms have incurred substantial additional
20 attorneys’ fees in implementing the settlement, working on notice and the claims
21 procedure, and overseeing the claims processing. That additional time incurred is
22 as follows, broken down by firm:

23 a. Law Offices of Douglas J. Campion, APC:

24 110.25 hours at \$750 per hour = \$82,692.50

25 b. Edelman Combs Lattuner & Goodwin, LLC:

26 198.1 hours at various rates = \$107,300

27 c. Hyde & Swigart:
28

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
27
28

1.7 hours at various rates = \$1,022.50

d. Law Offices of David Schafer

47.3 hours at various rates = \$21,060

4. Therefore, the additional fees incurred since the last filing total \$212,075, bringing our current lodestar to \$1,534,835.

5. Based upon the \$2,400,000 in fees sought, and a lodestar of \$1,534,835, that represents a multiplier of 1.5636.

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

Executed on August 22, 2016, pursuant to the laws of the United States.

/s/ Douglas J. Campion
Douglas J. Campion

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
27
28

Certificate of Service

I, Douglas J. Campion, hereby certify that on August 22, 2016 a copy of the following document was served on all counsel of record who are registered with the Court's electronic case filing (ECF) system by operation of the ECF system:

SUPPLEMENTAL DECLARATION OF DOUGLAS J. CAMPION IN SUPPORT OF PLAINTIFFS' COUNSEL'S MOTION FOR ATTORNEYS' FEES, APPROVAL OF COSTS AND FOR INCENTIVE PAYMENTS.

/s/ Douglas J. Campion
Douglas J. Campion