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David W. Slayton,
Executive Officer/Clerk of Court,
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10 *Attorneys for Plaintiff,*
11 Jennifer Goodwin

12 **SUPERIOR COURT OF CALIFORNIA**
13 **COUNTY OF LOS ANGELES – UNLIMITED CIVIL**

14 JENNIFER GOODWIN, individually and
15 on behalf of all others similarly situated,

15 Plaintiff,

16 v.

17 K M P Enterprises d/b/a Powell Electric,

18 Defendant.

Case No.: 20STCV18428

**DECLARATION OF PLAINTIFF
JENNIFER GOODWIN IN SUPPORT OF
MOTION FOR ATTORNEYS' FEES,
COSTS AND SERVICE AWARD**

Department: 14

Judge: Hon. Kenneth R. Freeman

Complaint Filed: May 14, 2020

DECLARATION OF JENNIFER GOODWIN

1 I, Jennifer Goodwin, declare:

- 2 1. I am the named Plaintiff in the above-captioned action against Defendant K M P
3 Enterprises d/b/a Powell Electric (“Powell Electric” or “Defendant”). If called as a
4 witness, I would competently testify to matters herein from personal knowledge.
- 5 2. I am filing this declaration in support of Plaintiff’s Unopposed Motion for Preliminary
6 Approval of Class Action Settlement and Certification of Settlement Class.
- 7 3. I, through my counsel, I filed the complaint in this lawsuit on May 14, 2020, for
8 violations of California Penal Code § 632.7 (“CIPA”) and common law invasion of
9 privacy. Later, a First Amended Complaint was filed to pursue a claim under CIPA
10 only.
- 11 4. I have agreed to a class action settlement with Powell Electric with the assistance of my
12 attorneys.
- 13 5. I have been appointed as Class Representative for this settlement, which settlement
14 involves a settlement fund of \$1,900,000 to provide compensation to Settlement Class
15 Members and pay for things such as class notice and administration expenses, as well as
16 attorneys’ fees, costs and any service award.
- 17 6. I have participated through this litigation in the belief I was helping all other persons
18 similarly situated whose cell phone calls were audio recorded by Defendant, and I intend
19 to continue to look after the best interest of the Settlement Class Members during the
20 settlement process.
- 21 7. I have been actively involved in this lawsuit and have keep in communication with my
22 attorneys about it. For example, I communicated with my attorneys for the initial
23 consultation, participated in calls regarding fact-finding efforts, served discovery
24 requests on Defendant through my attorneys, reviewing evidence, communicated with
25 my attorneys concerning mediation, and have exchanged several emails and had call
26 with my attorneys concerning settlement. I also reviewed and signed an initial class
27 action settlement agreement as well as a subsequent revised settlement agreement, and
28 submitted a declaration in support of preliminary approval of the proposed class action
settlement. Additionally, my attorneys have updated me on the progress of settlement
administration such as how many people so far have interacted with the Settlement

1 8. Since April of 2020 to the present, I have spent an estimated 19 hours working on this
2 litigation, including the tasks mentioned above. I anticipate spending additional time on
3 this case through the time of the hearing scheduled for January 16, 2024 for the Court to
4 decide whether to give final approval to this settlement.

5 9. In filing this lawsuit, I understood that there was potential risk that I might have to pay
6 some of Defendant's costs if I lost the lawsuit. I also recognize that by filing a lawsuit
7 that I was exposing myself to potential public scrutiny.

8 10. I understand that my attorneys intend to request that I be awarded \$4,000 as a service
9 award for my efforts in this lawsuit to represent the class members, which would be paid
10 from the settlement fund. I understand that any such award has to be approved by the
11 Court.

12 11. I support my attorney Kazerouni Law Group, APC's request for an award of attorneys'
13 fees of up to \$570,000 and costs up to \$25,000.

14 I declare under penalty of perjury that the foregoing is true and correct, executed on
15 September 25th, 2023, pursuant to the laws of the State of California.
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Jennifer Goodwin