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

KARANBIR SINGH, HARPREET SINGH, and  
NASTEHO OMAR,

Plaintiffs,

v.

IQ DATA INTERNATIONAL, INC., a Washington  
for profit corporation,

Defendant.

NO. 20-2-07084-0 SEA

**DECLARATION OF BLYTHE H. CHANDLER  
IN SUPPORT OF PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES, COSTS AND SERVICE  
AWARDS**

I, Blythe H. Chandler, declare as follows:

**A. Background and experience.**

1. I am a member of the law firm of Terrell Marshall Law Group PLLC (Terrell Marshall), counsel of record for Plaintiffs in this matter. I am admitted to practice before this Court and am a member in good standing of the bar of the state of Washington. I respectfully submit this declaration in support of Plaintiff's Motion for Attorneys' Fees, Costs and Service Awards. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

2. Terrell Marshall is a law firm in Seattle, Washington, that focuses on complex civil and commercial litigation with an emphasis on consumer protection, product defect, civil rights, and wage and hour cases. Terrell Marshall has been appointed lead or co-lead counsel

1 representing multi-state and nationwide classes in state and federal court in Washington and  
2 throughout the United States. Since its founding in 2008, the attorneys at Terrell Marshall have  
3 represented scores of classes, tried class actions in state and federal court, and obtained  
4 hundreds of millions of dollars in monetary relief to workers, consumers, and other individuals.

5         3. I joined Terrell Marshall in 2014 and became a member in 2018. I practice  
6 complex litigation with a focus on prosecution of consumer class actions. I have been appointed  
7 class counsel in cases challenging a wide range of unfair or deceptive practices, including debt  
8 collection practices. In 2010, I received my J.D. from the University of Washington School of  
9 Law with high honors, Order of the Coif. I served as Chief Articles Editor for the Washington Law  
10 Review. Before joining Terrell Marshall, I served as a law clerk to the Honorable Betty B.  
11 Fletcher, Senior United States Circuit Judge for the Ninth Circuit Court of Appeals, and to the  
12 Honorable John C. Coughenour, Senior United States District Judge for the Western District of  
13 Washington. I also served as a judicial extern to the Honorable Robert S. Lasnik, United States  
14 District Judge for the Western District of Washington. I co-authored chapters of the Consumer  
15 Protection Deskbook published by the Washington State Association for Justice (WSAJ) and  
16 have spoken on topics including use of experts and personal jurisdiction in class actions. I am a  
17 member of the Public Justice Foundation Board of Directors, a member of the Washington  
18 Employment Lawyers Association (WELA) Amicus Committee, and currently co-chair WSJA's  
19 Consumer Protection Section. I was named to the 2020 Rising Star List by Washington Super  
20 Lawyers.

21 **B. Qualifications of other Terrell Marshall attorneys.**

22         4. Beth E. Terrell is a founding member of Terrell Marshall. With over twenty years  
23 of experience, Ms. Terrell concentrates her practice in complex litigation, including the  
24 prosecution of consumer protection, defective product, and wage and hour class actions. Ms.  
25 Terrell has served as co-lead counsel on multi-state, multi-district, and nationwide class actions,  
26 resulting in hundreds of millions of dollars in settlements for consumers and workers. Ms.  
27

1 Terrell also represents individual employees with wage and hour, workplace exposure, and  
2 discrimination claims. Ms. Terrell has tried and won cases in state and federal courts and  
3 argued before the Washington State Court of Appeals and the Washington State Supreme Court  
4 as well as several federal circuit level courts. Ms. Terrell served as the President of the Public  
5 Justice Foundation Board of Directors from July 2019 to July 2020, serves on the Equal Justice  
6 Works' Board of Counselors, and is Chair of both the Northwest Consumer Law Center and the  
7 Washington Employment Lawyers Association. A member of the State Bar of California and the  
8 Washington State Bar Association, Ms. Terrell Co-Chairs PLI's Consumer Financial Services  
9 Institute, and frequently presents on a wide variety of topics, including class actions, consumer  
10 protection, legal ethics, gender equity, and electronic discovery.

11 5. Amanda M. Steiner became a member of Terrell Marshall in 2015. She practices  
12 complex litigation, including the prosecution of consumer, defective product, wage and hour,  
13 and civil rights class actions. Ms. Steiner received her J.D. from the UC Berkeley School of Law in  
14 1997. Admitted in Washington, California, New York and Hawaii, she has authored briefs that  
15 have resulted in numerous favorable decisions for plaintiffs in high-profile and complex  
16 securities, antitrust, consumer and civil rights class action in federal and state courts  
17 throughout the United States. Ms. Steiner was selected for inclusion in the annual Northern  
18 California "Super Lawyers" list and was named to the Top 50 Women Lawyers of Northern  
19 California. She is a Fellow of the American Bar Foundation.

20 6. Elizabeth A. Adams joined Terrell Marshall in 2015 and became a member of  
21 Terrell Marshall in 2022. Ms. Adams concentrates her practice in complex litigation, including  
22 the prosecution of consumer, wage and hour, and civil rights class actions. In 2012, Ms. Adams  
23 received her J.D. from the UCLA School of Law, where she received the Order of the Coif and  
24 served as a Comments Editor for the UCLA Law Review. Before joining Terrell Marshall, Ms.  
25 Adams served as a law clerk to the Honorable Dean D. Pregerson, the Honorable George Wu,  
26 and the Honorable John A. Kronstadt, all of the United States District Court for the Central  
27 District of California.

1           7.       Ben Drachler joined Terrell Marshall as an associate in 2017. Mr. Drachler  
2 concentrates his practice on complex civil litigation, including the prosecution of consumer,  
3 defective product, and wage and hour class actions. Mr. Drachler also litigates complex disputes  
4 involving vulnerable adults and trusts and estates. Mr. Drachler received his J.D. from Seattle  
5 University, graduating magna cum laude in 2015. Before joining Terrell Marshall, Mr. Drachler  
6 served as law clerk to the Honorable Robert H. Whaley in the United States District Court for  
7 the Eastern District of Washington, and to the Honorable Thomas S. Zilly in the Western District  
8 of Washington.

9           8.       Sarah Smith was an associate with Terrell Marshall from 2021 to 2022. Ms. Smith  
10 concentrated her practice on complex civil litigation, including the prosecution of consumer and  
11 employment class actions. Ms. Smith received her J.D. from the University of Washington,  
12 graduating with honors in 2019. Before joining Terrell Marshall, Ms. Smith served as law clerk  
13 to the Honorable Stanley A. Bastian in the Eastern District of Washington.

14 **C.       Other cases litigated by Terrell Marshall.**

15           9.       Examples of Fair Debt Collection Practices Act class actions that Terrell Marshall  
16 is litigating or has litigated to successful completion include:

- 17           a.       *Long v. First Resolution Investment Corp.*—Filed in 2018 on  
18 behalf of Washington consumers against whom a debt buyer  
19 and its collection agency law firm obtained judgments when the  
20 debt buyer was not licensed as a collection agency. The King  
21 County Superior Court granted final approval of a settlement  
22 providing over \$20 million in debt relief and \$600,000 on  
23 August 28, 2020.
- 24           b.       *Miller v. P.S.C., Inc.*—Filed in 2017 on behalf of Washington  
25 consumers who alleged P.S.C. filed lawsuits against them using  
26 unlawful debt collection forms. The Western District of  
27 Washington granted final approval of a settlement that  
provided injunctive relief and \$1.52 million on January 10, 2020.

- 1 c. *Bowen v. CSO Financial, Inc., et al.*—Filed in 2017 on behalf of  
2 consumers in Washington who received unfair and deceptive  
3 debt collection notices that included threats of criminal  
4 prosecution. The Western District of Washington granted final  
5 approval of a settlement that provided injunctive relief and  
6 \$345,000 on July 2018.
- 7 d. *Dibb, et al. v. AllianceOne Receivables Management, Inc.*—Filed  
8 in 2014 on behalf of Washington consumers who received  
9 unfair and deceptive debt collection notices that included  
10 threats of criminal prosecution. The Western District of  
11 Washington granted final approval of the \$1.9 million  
12 settlement on July 31, 2017.
- 13 e. *Solberg, et al. v. Victim Services, Inc., et al.*— Filed in 2014 on  
14 behalf of California consumers who received false, misleading,  
15 and deceptive debt collection letters printed on the letter head  
16 of county prosecuting attorneys. The Northern District of  
17 California granted final approval of a \$1.1 million settlement on  
18 August 19, 2021.
- 19 f. *Cavnar, et al. v. BounceBack, Inc.*—Filed in 2014 on behalf of  
20 Washington consumers who received false, misleading, and  
21 deceptive debt collection letters printed on the letterhead of  
22 county prosecuting attorneys. The Eastern District of  
23 Washington granted final approval of the \$530,000 settlement  
24 on September 15, 2016.

25 10. Additional information about class actions litigated by Terrell Marshall is  
26 available on our website [www.terrellmarshall.com](http://www.terrellmarshall.com).

27 **D. The prosecution of this action.**

11. Both parties took written discovery and depositions. Attached hereto as Exhibit  
A are true and correct copies of the orders cited in Plaintiffs’ Motion for Attorneys’ Fees, Costs,  
and Service Awards.

12. IQ Data sought interlocutory review of the Court’s orders denying its motions to  
disqualify the Class Representatives in Division I of the Washington Court of Appeals and the  
parties fully briefed IQ Data’s motion for discretionary review.

1           13.     IQ Data then removed this case to federal court under the Class Action Fairness  
2 Act. The federal court issued an order remanding the case to this Court on October 5, 2022, but  
3 IQ appealed that order. The parties had fully briefed the appeal in the Ninth Circuit Court of  
4 Appeals and were just a week away from oral argument when the case settled.

5           14.     While the federal court proceedings moved forward, the Commissioner for  
6 Division I also held a hearing IQ Data's motion for discretionary review, but deferred ruling until  
7 the federal proceedings were complete. IQ Data only dismissed the state appeal after this Court  
8 granted preliminary approval of the settlement.

9           15.     The parties participated in three full-day mediations before the case settled.  
10 They mediated with the Honorable John Erlick in March 2022, they participated in a full day  
11 mediation with Ninth Circuit Mediator Robert Kaiser in January 2023, and ultimately agreed on  
12 the settlement amount at the end of a full day mediation with the Honorable Paris Kallas (Ret.)  
13 in June 2023. The parties then negotiated the final terms of the Settlement Agreement through  
14 direct arm's length negotiations.

15           16.     Attached hereto as Exhibit B is the Order Granting Plaintiff's Unopposed Motion  
16 for Final Approval of Class Action Settlement and Award of Attorneys' Fees, Costs and Service  
17 Award in *Strong v. Numerica Credit Union*, No. 17-2-01406-39 (Yakima Cnty. Sup. Ct. Feb. 14,  
18 2020) (awarding one-third of fund)).

19           17.     Attached hereto as Exhibit C is the Final Approval Order and Entry of Judgment in  
20 *Dougherty v. Barrett Business Servs., Inc.*, No. 17-2-05619-1 (Clark Cnty. Sup. Ct. Nov. 8, 2019)  
21 (awarding one-third of fund)).

22           18.     Attached hereto as Exhibit D is the Order Approving Award of Attorneys' Fees  
23 and Costs in *Terrell v. Costco Wholesale Corp.*, No. 16-2-19140-1 SEA (King Cnty. Sup. Ct. June  
24 19, 2018) (awarding one-third of fund).

25           19.     Terrell Marshall has advanced significant costs for and invested more than a  
26 thousand hours into the investigation and prosecution of this case. We will continue to commit  
27

1 the time and resources necessary to litigate the case and fairly and adequately represent and  
2 protect the interests of the Classes.

3 20. Since the beginning of this case, Terrell Marshall has worked with no guarantee  
4 of being compensated for its time and efforts. Payment of Terrell Marshall's fees has always  
5 been contingent on successfully obtaining relief for the plaintiffs and the class members. As a  
6 result, there was a substantial risk of non-payment, particularly in light of the challenges  
7 inherent in this type of case. Work on this case has necessarily been to the exclusion of work on  
8 other matters that likely would have generated fees. Terrell Marshall has also been denied use  
9 of the fees it earned over the course of this case.

10 21. The work performed by paralegals and legal assistants was work that I or an  
11 attorney would have had to perform absent such assistance. All of our staff members are  
12 qualified to perform substantive legal work based on their training and past experience working  
13 for attorneys.

14 22. The following table identifies the attorneys and staff members from Terrell  
15 Marshall who worked on this case and for whom the recovery of fees is sought. For each of the  
16 timekeepers below I have stated the current hourly rate, the number of hours worked through  
17 November 28, 2023, and the total amount of fees. These time summaries are taken from  
18 contemporaneous, daily time reports prepared and maintained by Terrell Marshall in the  
19 regular course of business. All Terrell Marshall attorneys track their time in six minute  
20 increments.

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
<b>ATTORNEYS</b>				
Beth E. Terrell Founding Member J.D. from Univ. of California, Davis School of Law, 1995	Managed discovery matters including plaintiffs' responses to second sets of discovery; meetings and email communications with co-counsel regarding case management and strategy; drafted and revised motions	\$600	64.1	\$38,460.00

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
	relating to discovery; wrote and responded to voluminous discovery correspondence; defended client Omar's deposition and prepared for same; argued discovery motions; and participated in mediations.			
Toby J. Marshall Founding Member J.D. from Univ. of Washington School of Law, 2002		\$575	.4	\$230.00
Jennifer Rust Murray Founding Member J.D. from Univ. of Washington School of Law, 2005	Reviewed and edited motions; worked on client deposition preparation.	\$575	6.2	\$3,565.00
Amanda Steiner Member J.D. from UC Berkeley School of Law, 1997	Primary drafter of class certification briefing; drafted motion for leave to amend and mediation submissions.	\$575	77.6	\$44,620.00
Blythe D. Chandler Member J.D. from Univ. of Washington School of Law, 2010	Lead counsel for case; legal research; drafted and revised pleadings, motions, mediation submissions, discovery requests, appellate briefs, and deposition notices; argued motions to disqualify class representatives and appellate motion and prepared for same; participated in client depositions and meetings to prepare clients for deposition; reviewed documents to identify exhibits for motions and depositions; participated in all mediations; meetings and email communications with co-counsel regarding case management and strategy; wrote and responded to voluminous discovery correspondence; took deposed IQ Data corporate designee, for collector, and training	\$495	585.9	\$290,020.50



NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
	manger; participated in numerous discovery conferences with defense counsel; drafted settlement agreement and class notice documents.			
Elizabeth A. Adams Member J.D. from UCLA School of Law, 2012	Primary author of briefs pertaining to quashing subpoenas for client employment records, motions to disqualify clients as class representatives, response to motion for reconsideration, and motion for protective order filed in federal court; legal research related to briefing projects; worked on discovery matters relating to defendants' net worth and potential expert work; participated in numerous discovery conferences relating to same; managed client communications related to some discovery disputes; meetings and email communications with co-counsel regarding case management and strategy.	\$425	159.2	\$67,660.00
Ben Drachler Associate J.D. from Seattle Univ. School of Law, 2015	Worked on case management and revision of briefing.	\$375	.8	\$285.00
Eden Nordby Associate J.D. from Univ. of Washington School of Law, 2021	Worked on class notices and briefing relating to approval of same; participated in discovery conference relating to net worth information and drafted motion to compel production of same.	\$325	14.9	\$4,842.50
Brittany Glass Associate J.D. from Univ. of Texas School of Law, 2014	Worked on pleadings and discovery matters.	\$325	15.8	\$5,135.00
Maria Hoisington- Bingham Associate	Drafted stipulated motions relating to amendment of pleadings.	\$325	4.1	\$1,332.50

DECLARATION OF BLYTHE H. CHANDLER IN SUPPORT OF  
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS AND  
SERVICE AWARDS - 9  
CASE NO. 20-2-07084-0 SEA

**TERRELL MARSHALL LAW GROUP PLLC**  
936 North 34th Street, Suite 300  
Seattle, Washington 98103-8869  
TEL. 206.816.6603 • FAX 206.319.5450  
www.terrellmarshall.com

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
J.D. from Univ. of Washington School of Law, 2016				
Sarah Smith Associate J.D. from Univ. of Washington School of Law, 2019	Primary drafter of client objections and responses to voluminous discovery requests; correspondence and conferences relating to same; conducted legal research relating to numerous discovery disputes; meetings and email communications with co-counsel regarding case management and strategy; worked with experts on net worth calculation; legal research related to net worth valuation under the FDCPA; drafted discovery motions.	\$325	203.4	\$66,105.00
Charity Chen Summer Law Clerk	Performed legal research.	\$250	.7	\$175
<b>PARALEGALS/LEGAL ASSISTANTS</b>				
Jennifer Boschen Senior Paralegal 22 years legal experience	Assisted with Court filings and deposition preparation.	\$195	3.7	\$651.50
Jodi Nuss Senior Paralegal 9 years legal experience	Assisted with Court filings, assisted with deposition preparation, drafted and processed subpoenas, processed document productions, and performed data analysis.	\$195	52.3	\$10,048.50
Heather Brown Paralegal 20 years legal experience	Processed document productions and assisted with Court filings.	\$150	34.6	\$5,190.00
Holly Rota Legal Assistant 18 years legal experience	Worked on creating pleadings, maintaining the case file, processing subpoenas, and filing documents with the Court.	\$150	16.6	\$2,177.50
Krystal Brown Legal Assistant 13 Years legal experience	Worked on filing documents with the Court.	\$150	.5	\$75.00

DECLARATION OF BLYTHE H. CHANDLER IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS AND SERVICE AWARDS - 10  
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<b>NAME AND POSITION</b>	<b>DESCRIPTION OF WORK PERFORMED</b>	<b>RATE</b>	<b>HOURS BILLED</b>	<b>TOTAL</b>
Jessica Langsted Legal Assistant 6 years legal experience	Worked on docketing case deadlines, assisted with Court filings, assisted with deposition preparation, drafted and processed subpoenas, processed document productions.	\$150	56.3	\$8,445.00
Lauren Carter Legal Assistant 2 years legal experience	Worked on document production and securing translator services.	\$125	2.5	\$312.50
Chantal Montanez Legal Assistant 2 years legal experience	Performed case research and assisted with hearing preparation.	\$125	3.0	\$375.00
Tanya Stewart Legal Assistant 8 years legal experience	Worked on creating pleadings, maintaining the case file, and filing documents with the Court.	\$125	9.7	\$1,212.50
Ana Amezaga Legal Assistant 2 years legal experience	Worked on creating pleadings, maintaining the case file, and filing documents with the Court.	\$125	115.50	\$14,437.50
Jennifer Murphy Legal Assistant 4 years legal experience	Assisted with letter and exhibits to circuit court mediator.	\$150	1.0	\$150.00
Eva Thomas Legal Assistant 4 years legal experience	Worked on docketing case deadlines, performed case research, processed public records requests, and assisted with hearing preparation.	\$125	27.8	\$3,475.00
Hannah Kern Legal Assistant 1 year of legal experience	Arranged interpretation services for deposition.	\$125	4	\$500.00
Daniel Lee Legal Assistant 1 year legal experience	Worked on docketing case deadlines.	\$125	2	\$250.00
<b>TOTAL:</b>			<b>1462.6</b>	<b>\$569,730.50</b>

DECLARATION OF BLYTHE H. CHANDLER IN SUPPORT OF  
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SERVICE AWARDS - 11  
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www.terrellmarshall.com

1           23.     I anticipate the firm will incur additional fees in relation to the approval and  
2 settlement administration process.

3           24.     Terrell Marshall sets rates for attorneys and staff members based on a variety of  
4 factors, including among others: the experience, skill and sophistication required for the types  
5 of legal services typically performed; the rates customarily charged in the markets where legal  
6 services are typically performed; and the experience, reputation and ability of the attorneys  
7 and staff members.

8           25.     Terrell Marshall has incurred out-of-pocket litigation expenses totaling  
9 \$47,939.77, primarily to cover expenses related to translation services, court reporting, legal  
10 research, filing fees, mediation fees, and administrative costs such as copying, mailing, and  
11 messenger expenses. The following chart summarizes Terrell Marshall's litigation costs:

Category of Expense	Total
Copies (outside)	\$379.45
Courier/Process Server	\$1,108.61
Court Reporter	\$5,757.50
FedEx	\$47.83
Filing Fees	\$1,152.21
Investigator	\$1,385.00
Meals	\$34.65
Mediation Fees	\$6,920.00
PACER	\$4.20
Parking	\$13.00
Professional Fees	\$2,020.00
Records Requests	\$13.25

Category of Expense	Total
Transcripts	\$13,553.38
Translator Services	\$15,101.77
Westlaw	\$448.92
<b>TOTAL</b>	<b>\$47,939.77</b>

I declare under penalty of perjury of the laws of the State of Washington and the United States of America that the foregoing is true and correct.

EXECUTED at Seattle, Washington and dated this 6th day of December, 2023.

By: /s/ Blythe H. Chandler, WSBA #43387  
 Blythe H. Chandler, WSBA #43387

**DECLARATION OF SERVICE**

I, Blythe H. Chandler, hereby certify that on December 6, 2023, I caused true and correct copies of the foregoing to be served via the means indicated below:

Christopher E. Hawk, WSBA #43307  
Email: chawk@grsm.com  
Katherine L. Saint Germain, WSBA #46447  
Email: ksaintgermain@grsm.com  
Petra N. Ambrose, WSBA #48924  
Email: pambrose@grsm.com  
Amy P. Taylor, WSBA #53644  
Email: ataylor@grsm.com  
Mark B. Tuvim, WSBA #31909  
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701 Fifth Avenue, Suite 2100  
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Telephone: (503) 227-8269  
Facsimile: (503) 616-3600

- U.S. Mail, postage prepaid
- Hand Delivered via Messenger Service
- Overnight Courier
- Facsimile
- Electronic Mail
- Via the King County Electronic Filing Notification System

Sean P. Flynn, *Admitted Pro Hac Vice*  
Email: sflynn@grsm.com  
GORDON REES SCULLY MANSUKHANI, LLP  
201 West Liberty Street, Suite 320  
Reno, Nevada 89501  
Telephone: (702) 577-9317

- U.S. Mail, postage prepaid
- Hand Delivered via Messenger Service
- Overnight Courier
- Facsimile
- Electronic Mail
- Via the King County Electronic Filing Notification System

*Attorneys for Defendant*  
*I.Q. Data International, Inc.*

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

DATED this 6th day of December, 2023.

By: /s/ Blythe H. Chandler, WSBA #43387  
Blythe H. Chandler, WSBA #43387