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

KARANBIR SINGH, HARPREET SINGH, and  
NASTEO OMAR

Plaintiffs,

v.

RIDGEGATE, a Foreign limited liability  
company, AVENUE5, a Foreign limited liability  
company, BITTER LAKE VILLAGE ASSOCIATES,  
LP, a Washington limited partnership,  
INDEPENDENT LIVING ASSOCIATION, LLC, a  
Washington limited liability company, SENIOR  
HOUSING ASSISTANCE GROUP, a Washington  
non-profit corporation, IQ DATA, a  
Washington for profit corporation,

Defendants.

NO. 20-2-07084-0 SEA

**DECLARATION OF SAM LEONARD IN  
SUPPORT OF PLAINTIFFS’ MOTION FOR  
ATTORNEYS’ FEES, COSTS AND SERVICE  
AWARDS**

I, Sam Leonard, declare as follows:

1. I am one of the attorneys of record for Plaintiffs in this action and the sole member of Leonard Law, PLLC. I make this declaration based on my personal knowledge.

2. In this case, I have been the primary point of contact for Karanbir Singh, Harpreet Singh, and Nasteho Omar. I defended both Harpreet and Karanbir’s depositions and attended the deposition of Ms. Omar, which was defended by my-counsel. Each deposition lasted a full day. In addition, each of my clients spent hours preparing for their depositions in

1 meetings with my co-counsel and I. I perceived IQ Data's counsel's treatment of my clients  
2 during the depositions to be aggressive, rude, and demeaning.

3           3.       My contemporaneous time records, which are kept in six-minute increments,  
4 reflect that I have spent more than 244 hours litigating this case. My work on the case includes  
5 client meetings and regular communication by both phone and email, strategy and case  
6 management meetings with my co-counsel, email communications with co-counsel regarding  
7 strategy and case management, drafting discovery requests, responses, and correspondence,  
8 legal research, drafting pleadings and briefing, participating in mediation, reviewing client  
9 documents for production, and assisting co-counsel in hearing preparation.

10           4.       Currently I bill \$495 an hour on consumer class actions. My hourly rate is  
11 reasonable based on my extensive experience, skill, and sophistication required for the types of  
12 legal services typically performed and the rates customarily charged in the markets where my  
13 legal services are typically performed. I have been approved at similar rates in other class  
14 actions. For example, three years ago I was approved at \$400 an hour in another consumer  
15 class action. Since that time, inflation has hovered around 7% and I have gained 3 years of  
16 experience.

17           5.       The 244.3 hours I billed in this matter multiplied by regular hourly of \$495 per  
18 results in a current lodestar of \$120,928.50 in attorneys' fees.

19           6.       I have significant consumer protection litigation experience. Since starting my  
20 practice in November of 2015, I have helped over 200 individuals in individual consumer  
21 protection actions or debt defense actions. *See e.g. Pogrebinsky et al v. CACH, LLC*, Civ. No.  
22 2:16-cv-01607-TSZ (W.D. Wash. 2016); *Weinkauf v. Veristone Mortg., LLC*, et al, Civ. No. 3:16-cv-  
23 05471-RBL (W.D. Wash. 2016); *In re: Stephen Joseph Armstrong*, Civ. No. 16-10670-CMA (Bankr.  
24 W.D. Wash. 2016); *Columbia Recovery Group, LLC v. Keva Dodd et al*, Case No. 16-2-23043-1  
25 (King Co. Sup. Ct. 2016); *CACH, LLC v. Toby Smith*, Case No. 15-2-20977-9 (King Co. Sup. Ct.  
26 2015); *Columbia Credit Servs., Inc. v. Russell Brandt*, 05-2-15410-1 (King Co. Sup. Ct. 2005);  
27 *Brandt v. Columbia Credit Servs.*, No. C17-703RSM (W.D. Wash. 2017); *Columbia Recovery*

1 *Group, LLC v. Tanya Martin et al*, 16-2-24338-0 (King Co. Sup. Ct. 2016); *Columbia Debt*  
2 *Recovery, LLC v. Jordan Pierce and Donte Gardiner*, 19CIV12217KCX (King Co. Dist. Ct. 2019);  
3 *Fairway Collections, LLC v. Michael Turner*, 21-2-00097-14 (Grays Harbor Co. Sup. Ct. 2021).

4 7. I also have significant experience litigating consumer class actions. *See e.g. Dibb*  
5 *et al v. AllianceOne Receivables Mgmt., Inc.*, No. 14-5835 RJB (W.D. Wash. 2014); *Bowen et al. v.*  
6 *CSO et al.*, No. 2:17-cv-00677-JCC (W.D. Wash. 2017); *Esther Hoffman et al. v. Transworld*  
7 *Systems, Inc. et al.*, No. 2:18 cv 1132-JCC (W.D. Wash. 2018); *David Zarza v. Midwest Recovery*  
8 *Services, Inc. et al.*, Cs. No. 18-2-26378-6 (King Co. Sup. Ct. 2018); *Jammeh et. al. v. HNN*  
9 *Associates, LLC, et al.*, Civ. No. 19-cv-00620-JLR (W.D. Wash. 2019); *Long et al. v. First Resolution*  
10 *Investment Corp. et al.*, Cs. No. 19-2-11281-6 SEA (King Co. Sup. Ct. 2019); *Sanh v. Opportunity*  
11 *Financial, LLC et al.*, Civ. No. 2:20-cv-00310-RSL (W.D. Wash. 2020); *David Buck et. al. v.*  
12 *Northwest Commercial Real Estate Investments, LLC*, Cs. No. 21-2-03929-1 SEA (King Co. Sup. Ct.  
13 2021); *Jennifer Demarre and Ryan Demarre v. Mutual of Enumclaw Insurance Co.*, Cs. No. 21-2-  
14 10304-5 SEA (King Co. Sup. Ct. 2021). The class actions I have acted as counsel on have provided  
15 relief to tens of thousands of Washingtonians and resulted in injunctive relief and payments to  
16 class members that are valued at over 24 million dollars. I have also argued before the Ninth  
17 Circuit Court of Appeals, successfully reversing the trial court's dismissal of a consumer  
18 collection abuse putative class action. *See Hoffman v. Transworld Sys.*, No. 19-35058, 2020 U.S.  
19 App. LEXIS 8677 (9th Cir. Mar. 19, 2020).

20 8. Around ninety percent of my current practice focuses on debt collection abuse  
21 and debt defense cases. Primarily, I provide low-bono and contingent fee structures to my  
22 clients who often cannot afford the current market rate for legal services. I am one of only a  
23 handful of practitioners, that I know of, whose legal practice focuses on debt collection abuse  
24 and debt defense litigation in cases not primarily related to foreclosure.

25 9. I received a B.A. from Central Washington University in Ellensburg, Washington  
26 in 2004. In 2013, I received my J.D. cum laude from Seattle University School of Law, where I  
27 was President of the Public Interest Law Foundation, and a clinic student in the Korematsu

1 Center Civil Rights Amicus Clinic. In 2014, I wrote an opinion article, "The bankruptcy trap in  
2 student-loan debt," which was published in The Seattle Times. I have also had published three  
3 articles in the Washington State Association of Justice publication Trial News on litigating  
4 consumer debt defense cases.

5 10. I am actively involved in professional organizations and nonprofits engaged in  
6 consumer protection and debt collection abuse litigation. I am a member of the National  
7 Association of Consumer Advocates and an Eagle member of the Washington State Association  
8 for Justice. I am co-chair of the Washington Association of Justice's Consumer Protection  
9 Section. I am the Board Chair Elect of the Northwest Consumer Law Center, an organization  
10 which is primarily focused on providing pro-bono and low-bono legal services to low and  
11 moderate-income Washington residents relating to debt. I am also a member of the Public  
12 Justice Foundation and was named a Super Lawyers Rising Star.

13 11. I actively participate and attend CLEs, conferences, and social justice talks that  
14 focus on consumer law issues. I was a guest lecturer at Seattle University School of Law's  
15 Consumer Advocacy Clinic, where I spoke on Washington and federal debt collection law. In  
16 2017, I was a presenter at a Washington State Association of Justice CLE, where I spoke on how  
17 to run a successful consumer law practice. I have presented on the issue of debt collection  
18 abuse twice during Social Justice Mondays held at Seattle University School of Law and taught a  
19 Bankruptcy 101 class to students in Seattle University School of Law's Moderate Means  
20 program. I attended the Consumer Rights Litigation Conference hosted by the National  
21 Consumer Law Center in 2014, 2016, 2018, 2019, 2022 and 2023. I was also a presenter at the  
22 Consumer Rights Litigation Conference held in 2022. I have attended over 100 hours of  
23 continuing legal education classes on consumer and debt collection abuse litigation. I also  
24 mentor other consumer attorneys and law students looking to become consumer attorneys and  
25 regularly co-counsel with attorneys new to the practice of consumer law and debt defense.

26 12. Since 2008, I have volunteered at the King County Bar Association's  
27 Neighborhood Legal Clinic that specializes in debt issues. For the last seven years, I have

1 volunteered in my capacity as a debt defense and bankruptcy attorney. I am also a volunteer  
2 attorney for the Northwest Justice Project's debt clinic.

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

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

6 By: /s/ Sam Leonard, WSBA #46498  
7 Sam Leonard, WSBA #46498

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1 **DECLARATION OF SERVICE**

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

4 Christopher E. Hawk, WSBA #43307  
5 Email: chawk@grsm.com  
6 Katherine L. Saint Germain, WSBA #46447  
7 Email: ksaintgermain@grsm.com  
8 Petra N. Ambrose, WSBA #48924  
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14 GORDON REES SCULLY MANSUKHANI, LLP  
15 701 Fifth Avenue, Suite 2100  
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- U.S. Mail, postage prepaid
- Hand Delivered via Messenger Service
- Overnight Courier
- Facsimile
- Electronic Mail
- Via the King County Electronic Filing Notification System

14 Sean P. Flynn, *Admitted Pro Hac Vice*  
15 Email: sflynn@grsm.com  
16 GORDON REES SCULLY MANSUKHANI, LLP  
17 201 West Liberty Street, Suite 320  
18 Reno, Nevada 89501  
19 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

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

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

22 DATED this 6th day of December, 2023.

23  
24 By: /s/ Blythe H. Chandler, WSBA #43387  
25 Blythe H. Chandler, WSBA #43387  
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