

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION**

EDWARD HUYER, et al.,

Plaintiffs,

v.

WELLS FARGO & CO., and
WELLS FARGO BANK, N.A.,

Defendants.

Case No. 4:08-cv-00507-RP-CFB

Judge: Hon. Robert W. Pratt

**DECLARATION OF ROXANNE BARTON CONLIN FILED ON BEHALF OF
ROXANNE CONLIN & ASSOCIATES, PC IN SUPPORT OF APPLICATION FOR
AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, ROXANNE BARTON CONLIN, declare as follows:

1. I am Roxanne Barton Conlin and I submit this declaration in support of my firm’s application for an award of attorneys’ fees and for a reimbursement of expenses in the above-captioned litigation (the “Action”).

2. The statements and information that follow are, in part, based on information collected from Roxanne Conlin & Associates, PC books and records, and from information provided to me from employees working under my supervision and control.

3. In this Action, Roxanne Conlin & Associates, PC is counsel of record for the Plaintiffs and the Class.

4. The firm’s résumé is attached to this declaration as Exhibit A.

5. Roxanne Conlin & Associates, PC has spent 78.5 hours litigating this Action and its lodestar, as set forth below, is based on its current hourly rates, which are usual and customary in an Action of this type. The lodestar totals \$58,875.00.

<i>Name</i>	<i>Total Hours</i>	<i>Hourly Rate</i>	<i>Total Lodestar</i>
Partners			
Roxanne Conlin	78.5	750.00	\$58,875.00
Total Partners	78.5	750.00	\$58,875.00
Of Counsel			
Total Of Counsel			
Associates			

<i>Name</i>	<i>Total Hours</i>	<i>Hourly Rate</i>	<i>Total Lodestar</i>
Total Associates			
Law Clerks			
Total Law Clerks			
Paralegals			
Total Paralegals			
TOTALS			58,875.00

6. Roxanne Conlin & Associates, PC has incurred expenses in this Action that total \$303.36. The expenses are as follows:

<i>EXPENSE</i>	<i>TOTAL</i>
Consultants	
Courier	
Court Reporters/Transcripts	
Document Production/Storage	
Experts	
Filing, Witness & Other Fees	225.00
Mediation	
On-Line Research	39.88
Photocopies	38.10

<i>EXPENSE</i>	<i>TOTAL</i>
Postage	
Staff Overtime	
Supplies	
Telephone, Facsimile	.38
Travel (Meals, Hotels & Transportation)	
<i>TOTAL</i>	303.36

7. All of the time and expense incurred in the Action are reflected in the books and records of Roxanne Conlin & Associates, PC, except for the time and expense to attend the Court's Final Approval Hearing on January 21, 2016, which was estimated. Except for the Final Approval Hearing, the expenses in this Action are supported by vouchers, checks, time records, and other documents, contained in the books and records of Roxanne Conlin & Associates, PC.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of December, 2015, at Des Moines, Iowa.

/s/ Roxanne Barton Conlin
 ROXANNE BARTON CONLIN

EXHIBIT A

Roxanne Barton Conlin

04.19.13

Edna Griffin Building, Suite 600
319 7th Street
Des Moines, Iowa 50309
(H) 515-285-0962
(O) 515-283-1111
Fax 515-282-0477
email: roxlaw@aol.com
www.roxanneconlinlaw.com

Professional:

- | | |
|--------------|--|
| 1991-Present | Roxanne Conlin & Associates, P.C.
Law Firm Focus: Civil Litigation
Employment Civil Rights, Personal Injury, and Constitutional Law |
| 1983-1990 | Galligan and Conlin, P.C.
Law Firm Focus: Civil Litigation
Employment, Civil Rights, Personal Injury and Constitutional Law |
| 1982 | Democratic nominee for Governor of the State of Iowa |
| 1977-1981 | United States Attorney for the Southern District of Iowa
Attorney General's Advisory Committee of United States Attorneys,
Consultant: Attorney General Advocacy Institute |
| 1977-1979 | Adjunct Professor of Law, University of Iowa Law School
First Course on Women and the Law in Iowa |
| 1976-1977 | Consultant to the United States Commission on the Observance of
International Women's Year, United States Department of State |
| 1969-1976 | Assistant Attorney General for the State of Iowa
Director, Iowa Civil Rights Section, Department of Justice –
Duties included prosecution of anti-trust suits and removal of public
officials guilty of public misconduct |
| 1967-1968 | Deputy Industrial Commissioner |
| 1966-1967 | Private Practice |

Honors and Awards

- | | |
|------|--|
| 2013 | Bloomer/Catt Award for Public Service. Status of Women Conference. |
| 2013 | Alumni Achievement Award - Drake Law School |
| 2013 | Selected by Martindale-Hubbell as a Preeminent Woman Lawyer - exclusively for women attorneys who have received the highest possible rating in both legal ability and ethical standards from their peers |
| 2011 | Recognized as being in the top 5% of America's Most Honored Professionals. |
| 2011 | Community Champion Award from the Civil Justice Foundation. |
| 2011 | National Championship Honoree from the American Mock Trial Association. |
| 2010 | Community Champion Award from the Civil Justice Foundation. |
| 2010 | Selected as one of Labor & Employment's Best Lawyers. |
| 2009 | Gertrude Rush Award from Iowa State Bar Association. |
| 2009 | Selected as a Fellow of the American Bar Foundation. |
| 2009 | Selected as one of Midwest CEO's Most Influential Women of 2009. |
| 2008 | Selected as one of Lawdragon's 500 Leading Lawyers in America. |
| 2008 | Iowa Senate Resolution 134 commending work and congratulating for accomplishments, passed unanimously. |
| 2008 | 2008 Louise Noun Visionary Women Award – awarded by the Young Women's Resource Center. |
| 2008 | Inducted into Iowa Legal Aid Hall of Fame. |
| 2007 | 1 st recipient of the Iowa Trial Lawyer's Public Justice Award, named the Roxanne Conlin Public Justice Award. |

- 2007 Inducted into the Iowa Democratic Party Hall of Fame as Outstanding Supporter.
- 2007 Elected to Litigation Counsel of America.
- 2006 American Association of Justice (formerly Association of Trial Lawyers of America), Leonard M. Ring Champion of Justice Award – Awarded annually to a member whose life and career epitomizes that of a true champion of justice.
- 2005 Activist Leader Award from Drake University, United Way and the Des Moines ‘Business Record’.
- 2005 Iowa Trial Lawyers Association, 2005 ITLA Public Justice Award in Recognition of Persistence and Determination in Pursuing Successful Litigation that Establishes the Right to Trial by Jury for Plaintiffs in Civil Rights Cases under the Iowa Civil Rights Act.
- 2005 Association of Trial Lawyers of America, National College of Advocacy, Diplomat of Trial Advocacy.
- 2005 Iowa Juneteenth Observance Liberty Award.
- 2005 The Iowa Shares Special Recognition in Iowa for efforts to resettle Vietnamese boat people in Iowa.
- 2004 Ruth Bader Ginsburg Award from NOW Legal Defense and Education Fund.
- 2004 The 2004 Bar Register of Preeminent Lawyers 88th Edition.
- 2003 Lifetime Achievement Award from ATLA.
- 2003 Mary Louise Smith Human Rights Award from the Des Moines Human Rights Commission.
- 2002 Elected to Membership in the College of Labor and Employment Lawyers.
- 2002 Award from Very Special Arts of Iowa serving disabled Iowans.

- 2002 Award from United Way for work with Young Women's Resource Center.
- 2002 Named by National Law Journal as One of the Ten Most Influential Women Attorneys.
- 2001 Mary Louise Smith Award for Racial Justice from the YWCA.
- 2000 Marie Lambert Award for Equality for Women from the Association of Trial Lawyers of America.
- 2000 Selected as One of Twelve Most Influential Women by the Des Moines 'Business Record'.
- 2000 Named One of the Fifty Most Influential Iowans of the Twentieth Century by Des Moines Register.
- 1999 Martindale Hubbell Bar Register of Preeminent Attorneys.
- 1999 International Society of Lawyers for Public Service.
- 1999 Kansas City Association of Women Lawyers established the Annual Roxanne Barton Conlin Scholarship.
- 1998 Rosalie Wahl Leadership Award from the Minnesota Women Lawyers Association.
- 1998 Named by the National Law Journal as one of "The Fifty Most Influential Women Lawyers in America".
- 1997 Named Woman of the Year by the Metro Women's Network.
- 1995-Present Featured in Best Lawyers in America.
- 1995 Elected to Membership in the Inner Circle of Advocates.
- 1994 Elected to membership in the American Law Institute.
- 1994 APEX Award recognizing excellence in opinion column writing for President's Page in Trial of June, 1993 on Alcoholism.
- 1993 Verne Lawyer Outstanding Member Award from the Iowa Association of Trial Lawyers.

- 1993 Elected to Membership in the International Academy of Trial Lawyers.
- 1992 7th Annual Chester Bedell Memorial Lecture.
- 1992 Life Fellow of the Iowa State Bar Association.
- 1992 One of the women featured in the book More Strongminded Women by Louise Noun (ISU Press).
- 1991 Named one of 100 most influential lawyers in the nation by National Law Journal.
- 1991 Elected to Membership in the Iowa Academy of Trial Lawyers.
- 1991 Certified as a Civil Trial Advocate by the National Board of Trial Advocacy.
- 1990 Diplomat of the American Board of Professional Liability Attorneys.
- 1989 Outstanding Alumni Award, Drake University Law School.
- 1989 Woman of Vision Award, Young Women's Resource Center.
- 1989 Named one of the nation's top ten litigators in an article in the National Law Journal.
- 1987 Iowa Citizens Action Network Annual Award for Public Service.
- 1981 Iowa Women's Hall of Fame.
- 1981 Omicron Delta Kappa, Alumni Member.
- 1981 Award for Outstanding Assistance - United States Secret Service.
- 1979 Special Commendation - Director of Federal Bureau of Investigation.
- 1978 Special Commendation - United States Postal Inspection Service.
- 1976 Chosen in article in McCall's Magazine (November issue) as one of 44 Women qualified for a Cabinet Position.
- 1975 Honorary Doctor of Laws, University of Dubuque.

- 1975 Chosen in article in Redbook Magazine as one of "44 Women Who Could Save America".
- 1974 Outstanding Service to Civil Liberties presented by the Iowa Civil Liberties Union.
- 1974 Martin Luther King, Jr. award for outstanding service presented by Amalgamated Meat Cutters and Butcher Workmen of N.A. AFL-CIO.
- 1974 The Outstanding Young Woman of Iowa.

Civic and Professional Activities

- 2000 – Current Elected to membership in the Litigation Counsel of America, National Center for State Court Lawyers Committee, 2003 - 2006 Board of Directors Trial Lawyers Care, the National Pro Bono Effort for the Victims of the September 11th Tragedy, 2001 - 2004
- 1990 – President – Roscoe Pound Foundation, 1994 - 1997
Elected to Membership in the American Law Institute, 1994 - Present
Trustee in the American Jury Trial Foundation, 1993 - Present
President of the Association of Trial Lawyers of America, 1992 - 1993;
President-Elect (1991-1992); Vice-President (1990-1991);
Secretary (1989-1990); Parliamentarian (1988-1989); and
ATLA-PAC Board of Directors (1987-1989)
Chair of the following Association of Trial Lawyers of America committees: Organization Review Committee; Education Committee; Membership Oversight Committee; Consumer and Victims Coalition Committee; Safety Conference Committee; Member of Roscoe Pound Foundation Board of Governors, and various other committees (1986-1992)
Board of Directors of the National Association of Former United States Attorneys, 1991 - 2000
Advisory Board Member - Older Iowans' Permanent Fund Foundation, 1991 - 1997
Board Member – Trial Lawyers for Public Justice, 1991 - 2000
Honorary Board Member, Animal Rescue League of Iowa, 1990 - 1995
- 1980 – Master of the Bench, Blackstone Inn, American Inns of Court, 1989 - Present
Co-Chair, Higher Education Task Force of the State of Iowa, 1988 - 1992

Advisory Board, Coalition for Women's Appointments, 1988 - 1990
President, Civil Justice Foundation, 1986 - 1988
Council on Judicial Selection, Appointed by Chief Justice Reynolds, 1986
Board of Directors, YWCA, 1986 - 1988
Chair, Board of Governors, Drake University Law School Endowment Trust, 1985 - 1986
Board of Governors, Association of Trial Lawyers of Iowa, 1984 - 1995
Board of Directors, NOW Legal Defense and Education Fund, 1983 - 1989
President, 1986 to 1988; General Counsel, 1985-1986
Board of Directors, Dowling High School, 1981 - 2001
President, Vice President, Federal Executive Council, 1979 - 1981

1970 -

Member, Des Moines Chamber of Commerce, 1979 - Present
Board of Directors, Iowa Shares Program, 1978 - 1980
Advisory Board, National Women's Political Caucus, 1977 - 1992
Law Board of Counselors for Drake University Law School, 1977 - 1985
Panelist, Upper Midwest Council - Critical Choice Project, 1976 - 1977
Youth for Understanding, Bicentennial Committee of Iowa, 1976
Administrative Committee Member, National Women's Political Caucus, 1975 - 1977
Board of Directors, Polk County Rape/Sexual Assault Care Center, 1974 - 1977
Board of Directors, Riverhills Day Care Center, 1974 - 1975
Founder and State Chairperson, Iowa Women's Political Caucus, 1973 - 1975
Iowa Commission on the Status of Women, 1972 - 1978
Member, American Bar Association and various sections and committees, 1966 - Present
Member, Iowa Bar Association, 1966 - Present; Career Day Panel, Bar Review Committee, Federal Practice Committee, Uniform Court Instructions Committee (1987-1992)

Education

Drake University. Bachelor of Arts, 1964. Phi Beta Kappa. Alpha Lambda Delta, Women's Honorary Sorority. Chi Omega Social Service Award for work with underprivileged children. National Merit Scholarship Finalist. Reader's Digest Scholar.

Drake University Law School. Juris Doctorate, 1966. Law Review. Representative to American Law Student Association. Fischer Foundation Scholar. Dean: Kappa Beta Phi Legal Sorority.

Drake University. Master's Degree in Public Administration, 1979. Pi Alpha Alpha, Honorary Society in Public Affairs and Administration, 1978.

Harvard University. Recipient: Grant for Seminar entitled Limits of Positivism: Certainty and Justice in the Law. August, 1980.

Notable Listings

Who's Who in America
Who's Who in American Law
Who's Who in Government
Who's Who of American Women
Who's Who in the Middlewest
Who's Who in Politics
Dictionary of International Biography
World's Who's Who of Women
The Best Lawyers in America
Bar Register of Preeminent Lawyers

Selected Articles and Book Chapters

"Voiur Dire for the Plaintiff in a Medical Malpractice Case", Jury Selection – 4th Edition, (Aspen Publishers 2010)

"ATLA's Litigating Tort Cases", 6 volumes, Co-editor West Publishing Company (June, 2003)

"In Defense of the American Trial Lawyer", The Aspen Institute Quarterly (Spring, 1993, Volume V, No. II, Page 128)

"Loser Pays" Rule: Who Pays for Injustice, with Clarence L. King, Jr., National Law Journal, July, 1992 (Reprinted in Trial Magazine, October, 1992)

"Making the Opposing Expert Tell the Truth", 22 Trial Lawyers Quarterly, No. 1, p. 50 (Fall, 1991)

"Voiur Dire Examination and Jury Selection", Anatomy of a Personal Injury Lawsuit - 3rd Edition, (ATLA Press 1991)

"Litigation Explosion Disputed", National Law Journal, July 29, 1991 (Reprinted in Trial Magazine, p. 114, "'Litigation Explosion' Tempest in a Teapot?", Nov. 1991 as published by ATLA)

"Women, Power, and the Law", 26 Trial, 22 (Feb., 1990)

"Landlord Liability for Criminal Attack on Client", 35 Am. Jur. Trials 1 (1987)

Legal Status of Homemakers in Iowa, United States Commission on International Women's Year, November, 1976

"Government Policy and the Legal Status of Women", Women in the Professions, Ed. Laurily Keir Epstein, Lexington Books, 1976

Equal Protection vs. The Equal Rights Amendment - Where Are We Now?, 24 Drake Law Review 259 (Winter 1975)

Personal

Born June 30, 1944, Huron, South Dakota

Married to James C. Conlin, March 24, 1964; 4 children; 5 grandchildren

Political

Democratic Nominee for Iowa for United States Senate, 2010

Co-Chair Edwards for President, 2008

Inducted into the Iowa Democratic Party Hall of Fame as Outstanding Supporter, 2007

Co-Chair Edwards for President, 2004

Chair, Iowa Democratic Party, November, 1998 – April, 1999

Member, Senior Women's Strategy Council - Mondale/Ferraro Campaign, 1984

Co-chair Women for Harkin Committee, 1984

Chair, National Policy Council, John Glenn for President Committee, 1983 - 1984

Democratic Nominee for Governor of Iowa, 1982

Chair of the panel on Food & Agricultural Policies for Democratic National Committee, Philadelphia, 1982

Headquarters Volunteer - Carter for President, 1976

Vice-Chair of Iowa Delegation to the National Mid-term Convention, 1974

Delegate - Iowa Democratic State Conventions, Member of the Platform, Rules and By-Laws Committee, 1964 - 1974

Precinct Committeewoman - Polk County Democratic Party, 1966 - 1972

Volunteer - Hughes for United State Senate, 1968

National Committeewoman - Iowa Young Democrats, 1965 - 1966

President - Polk County Young Democrats, 1964 - 1966

Volunteer - Hughes for Governor, 1962 – 1964 - 1966