

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

GREGORY YOUNG, et al.,

Plaintiffs,

v.

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

Defendants.

Case No. 4:08-cv-507-RP-CFB

**REPLY DECLARATION OF DEBORAH  
CLARK-WEINTRAUB IN SUPPORT OF  
MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT AND  
FOR AN AWARD OF ATTORNEYS'  
FEES AND REIMBURSEMENT OF  
LITIGATION EXPENSES TO  
PLAINTIFFS' COUNSEL AND SERVICE  
AWARDS TO CLASS  
REPRESENTATIVES**

1. I am a member of Scott+Scott, Attorneys at Law, LLP (“Scott+Scott”), one of Plaintiffs’ Co-Lead Counsel in this action. I respectfully submit this reply declaration in further support of Plaintiffs’ motion for final approval of the proposed Settlement<sup>1</sup> and approval of the proposed Plan of Allocation, as well as Class Counsel’s motion for an award of attorneys’ fees and reimbursement of Litigation Expenses.

2. Attached hereto as Exhibit A is a true and correct copy of an objection to the Settlement received from Class member Janis Flakes.

3. Attached hereto as Exhibit B is a true and correct copy of an objection to the Settlement received from Class member James J. Juliano.

4. Attached hereto as Exhibit C are true and correct copies of objections to class action settlements filed by Rhadiante Van de Voorde in *Astiana v. Kashi Company*, No. 3:11-CV-1967 (S.D. Cal.); *Schlesinger v. Ticketmaster*, No. BC 304565 (Cal. Super. Ct.); *Skold v. Intel Corporation*, Case No. 1-05-CV-039231 (Cal. Super. Ct.).

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<sup>1</sup> All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated August 21, 2015 (“Stipulation”) (ECF No. 243-3).

5. Attached hereto as Exhibit D is a true and correct copy of the court's Order denying Ms. Van de Voorde's objections and granting final approval to the settlement in *Astiana v. Kashi Co.*, No. 3:11-CV-1967 (S.D. Cal. Sept. 2, 2014).

6. Attached hereto as Exhibit E is a true and correct copy of the court's Order denying Ms. Van de Voorde's objections and granting final approval to the settlement in *Schlesinger v. Ticketmaster*, No. BC 304565 (Cal. Super. Ct. Feb. 27, 2015).

7. Attached hereto as Exhibit F is a true and correct copy of the notice withdrawing Ms. Van de Voorde's objection to the settlement in *Skold v. Intel Corporation*, Case No. 1-05-CV-039231 (Cal. Super. Ct.).

8. Attached hereto as Exhibit G are true and correct copies of objections to class action settlements filed by Jennifer Deachin in *Fladell v. Wells Fargo Bank, N.A.*, No. 13-cv-60721 (S.D. Fla.); *Fraley v. Facebook, Inc.*, No. 11-cv-1726 (N.D. Cal.); *In re Polyurethane Foam Antitrust Litig.*, No. 10-md-2196 (N.D. Ohio); *Blessing v. Sirius XM Radio Inc.*, No. 09-cv-10035 (S.D.N.Y.); *Faught v. American Home Shield*, No. 2:07-cv-1928 (N.D. Ala.), and *In re Mattel, Inc. Toy Lead Paint Prods. Liab. Litig.*, No. 07-ml-1897 (C.D. Cal.).

9. Attached hereto as Exhibit H is a true and correct copy of the court's Order denying Ms. Deachin's objections and granting final approval to the settlement in *Fladell v. Wells Fargo*, No. 13-cv-60721 (S.D. Fla. Oct. 29, 2014).

10. Attached hereto as Exhibit I is a true and correct copy of the court's Order denying Ms. Deachin's objections and granting final approval to the settlement in *In re Mattel, Inc. Toy Lead Paint Prods. Liab. Litig.*, No. 2:07-ml-01897-DSF-AJW (C.D. Cal. Mar. 24, 2010).

11. Attached hereto as Exhibit J are true and correct copies of Orders granting motions by Ms. Deachin to voluntarily dismiss her appeals of the Orders granting final approval to the class action settlements in *Fladell* and *Fraley*.

12. Attached hereto as Exhibit K are true and correct copies of objections to class action settlements filed by Julius N. Dunmore, Jr. in *Malta v. The Federal Home Loan Mortgage Corporation*, No. 3:10-cv-1290 (S.D. Cal.); and *In re TFT-LCD (Flat Panel) Antitrust Litig.*, 3:07-md-1827 (N.D. Cal.).

13. Attached hereto as Exhibit L is a true and correct copy of the court's Order denying Mr. Dunmore's objection and granting final approval to the settlement in *Malta v. The Federal Home Loan Mortgage Corporation*, No. 3:10-cv-1290 (S.D. Cal. Jun. 21, 2013).

14. Attached hereto as Exhibit M are true and correct copies of Orders granting motions by Mr. Dunmore to voluntarily dismiss his appeals of the Orders granting final approval to the class action settlements in *Malta* and *TFT-LCD*.

15. Attached hereto as Exhibit N is a true and correct copy of Lisa Lerer, "Fringe Player," *Corporate Counsel* (October 2004).

I declare, under penalty of perjury, that the foregoing facts are true and correct.

Dated: January 14, 2016

/s/ Deborah Clark-Weintraub  
Deborah Clark-Weintraub