

**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 KIM E. RICHMAN
IN SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES**

I, Kim E. Richman, declare as follows:

1. I am the Managing Member of The Richman Law Group and I submit this declaration in support of my firm's application for an award of attorneys' fees in the above-captioned litigation (the "Action").

2. The statements and information that follow are based on information collected from The Richman Law Group's books and records.

3. In this Action, The Richman Law Group is counsel of record for the Plaintiffs and the Class.

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

5. I have spent one thousand one hundred and eighty (1,180) hours litigating this Action and its lodestar, as set forth below, is based on my current hourly rates, which is usual and customary in an Action of this type. The lodestar totals \$767,000.00.

<i>Name</i>	<i>Total Hours</i>	<i>Hourly Rate</i>	<i>Total Lodestar</i>
Kim E. Richman	1,180	\$650	\$767,000.00
<i>TOTALS</i>			\$767,000.00

6. The Richman Law Group has incurred no expenses in this Action.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of December, 2015, at Brooklyn, New York.



Kim E. Richman
The Richman Law Group
81 Prospect Street
Brooklyn, NY 11201

Exhibit A

THE RICHMAN LAW GROUP

The Richman Law Group represents consumers in a wide array of class action litigation throughout the nation. The attorneys of The Richman Law Group are skilled litigators with years of experience in federal and state courts. The Richman Law Group is based in Brooklyn, New York.

Recent and current cases litigated by Mr. Richman of The Richman Law Group on behalf of consumers include the following:

Chin v. RCN Corporation, 08-CV-7349 RJS (S.D.N.Y.): class action violation of Virginia's consumer protection law; *Gaines v. Home Loan Center, Inc.*, 08-CV-667 DOC (C.D. Cal): class action for violation of the Racketeer Influenced and Corrupt Organizations (RICO) Act; *Bodoin v. Impeccable L.L.C.*, Index No. 601801/08 (N.Y. Sup. Ct.): individual action for conspiracy and fraud; *Tan v. Comcast Corporation*, 08-CV-02735 LDD (E.D. Pa.): class action for violation of the federal Computer Fraud and Abuse Act (CFAA); *All-Star Carts and Vehicles Inc. v. BFI Canada Income Fund*, 08-CV-1816 LDW (E.D.N.Y.): class action violation of the Sherman Antitrust Act; *In re. American Funds Securities Litigation*, 06-CV-7815-GAF (C.D. Cal): class action for violations of § 12(a)(2) of the Securities Act of 1933 and § 10(b) of the Securities Exchange Act of 1934; *Fink v. Time Warner Cable*, 08-CV-9628 LTS (S.D.N.Y.): class action for violation of New York's consumer protection law; *Serrano v. Cablevision Systems Corporation*, 09-CV-1056 DI (E.D.N.Y.): class action for violation of CFAA and of New York's consumer protection law; *S.K. v. General Nutrition Corporation*, 08-CV-9263 LAK (S.D.N.Y.): class action for violation of New York's consumer protection laws; *Petlack v. S.C. Johnson & Son, Inc.*, 08-CV-00820 CNC (E.D. Wisconsin): class action for violation of Wisconsin consumer protection law; *Hill v. Roll International Corporation*, CGC-09-487547 (San Francisco County Superior Court): class action for violation of California's consumer protection laws; *L'ottavo Ristorante v. Ingomar Packing Co.*, 09-CV-01427 (E.D. Cal): class action for violation of the Sherman Antitrust Act; *Barron v. Snyder's-Lance, Inc.*, No. 0:13-CV-62496-JAL (S.D. Fla.): class action involving "Snyder's," "Cape Cod," "EatSmart," and "Padrinos" brand food products labeled as "natural" and allegedly containing genetically-modified organisms and other synthetic ingredients; *In re: Frito Lay North America, Inc. "All Natural" Litigation*, No. 1:12-MD-02413-RRM-RLM (E.D.N.Y.): class action involving "Sun Chips," "Tostitos," and "Bean Dip" products labeled as "natural" and allegedly containing genetically-modified organisms; *In re: Simply Orange Orange Juice Marketing and Sales Practices Litigation*, No. 4:12-MD-02361-FJG (W.D. Mo.): class action involving "Simply Orange" brand orange juice labeled as "100% pure" and "natural," allegedly containing synthetic flavoring, and allegedly subject to a high degree of processing; *Koehler v. Pepperidge Farm, Inc.*, No. 13-CV-02607-PAB-BNB (D.Colo.): class action involving "Goldfish" snack product labeled "natural" and allegedly containing genetically-modified organisms; *Wayne Koh, et.al. v. SC Johnson & Son, Inc.* 5:09-cv-00927, U.S. District Court for the Northern District of California, class action which introduced the concept of "greenwashing" in violation of California's advertising laws; *Rich v. Lowe's Home Centers, Inc.*, No. 3:13-cv-30144-MGM, class action for violation of Massachusetts Unfair Trade Practices Act and Unjust Enrichment; *Segedie et. al. v. The Hain*

Celestial Group, Inc. et al., 7:14-cv-05029-NSR-LMS, class action involving the labeling of Earth's Best Baby Formula labeled as "organic", allegedly containing ingredients that are not natural and/or explicitly designated as "non-organic" under federal law; *In re ConAgra Foods, Inc.*, multi-district class action involving the labeling of Wesson cooking oils, as "100% Natural", alleging the oils were produced from unnaturally, genetically modified organisms ("GMO's), in violation of numerous state consumer protection laws; *Goldemberg, et al v. Johnson & Johnson Consumer Companies, Inc.* 7:13-cv-03073-NSR-LMS (S.D.N.Y), class action involving the fraudulent "natural" claims on several Aveeno "Active Naturals" skin moisturizers, allegedly containing dozens of harmful and synthetic chemicals and unnatural ingredients, violating New York, California, and Florida state consumer protection laws; *Paulino et al v. Conopco, Inc.* 1:14-cv-05145-JG-RML (EDNY), class action involving "Suave Naturals" line of shampoos and conditioners, using imagery of "natural ingredients" to convey a supposed benefit of the product while allegedly containing dozens of harmful and synthetic chemicals in violation of New York and California state consumer protection law; *Normand v. Nestle Purina Petcare Company* 6:15-cv-06141-MAT (WDNY), federal class action involving the Beneful brand dog food which is alleged to be linked to the poisoning and death of thousands of dogs around the county; *Brenner v. Williams-Sonoma, Inc.* 1:13-cv-10931 (District of Massachusetts), class action involving Willams-Sonoma, allegedly gathering zip codes during credit card transactions for the purpose of building databases for advertising and campaigns, in violation of Massachusetts Unfair Trade Act.