

**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 MARIO A. PACELLA FILED ON BEHALF OF
STROM LAW FIRM, L.L.C. IN SUPPORT OF APPLICATION FOR AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, MARIO A. PACELLA declare as follows:

1. I am Mario A. Pacella, an attorney at Strom Law Firm, LLC, 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 Strom Law Firm, L.L.C. books and records, and from information provided to me from employees working under my supervision and control.

3. In this Action, Strom Law Firm, L.L.C. is counsel of record for the Plaintiffs and the Class.

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

5. Strom Law Firm has spent 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 \$61,406.25.

<i>Name</i>	<i>Total Hours</i>	<i>Hourly Rate</i>	<i>Total Lodestar</i>
Partners			
J. Preston Strom, Jr.	9.00	\$700.00	\$6,300.00
Total Partners	9.00	\$700.00	\$6,300.00
Of Counsel			
Total Of Counsel	0	0	0
Associates			
Mario A. Pacella	85.00	\$550.00	\$46,750.00
Amanda Wick	9.75	\$250.00	\$2,437.50

<i>Name</i>	<i>Total Hours</i>	<i>Hourly Rate</i>	<i>Total Lodestar</i>
John R. Alphin	1.00	\$375.00	\$375.00
Robyn W. Madden	2.75	\$375.00	\$1,031.25
Total Associates	98.50		\$50,593.75
Law Clerks	0	0	0
Total Law Clerks	0	0	0
Paralegals			
Denise J. Weltz	19.75	110.00	\$2,172.50
Chelsea Laughter	13.75	90.00	\$1,237.50
April Gonzalez	12.25	90.00	\$ 1,102.50
Total Paralegals	45.75		\$4,512.50
TOTALS	153.25		\$61,406.25

6. Strom Law Firm, L.L.C. has incurred expenses in this Action that total \$6,946.81.

The expenses are as follows:

<i>EXPENSE</i>	<i>TOTAL</i>
Consultants	
Courier	
Court Reporters/Transcripts	\$2,453.12
Document Production/Storage	
Experts	
Filing, Witness & Other Fees	\$150.00
Mediation	
On-Line Research	\$141.22
Photocopies	\$696.64

<i>EXPENSE</i>	<i>TOTAL</i>
Postage	\$231.41
Staff Overtime	
Supplies	
Telephone, Facsimile	\$4.00
Travel (Meals, Hotels & Transportation)	\$3,270.42
<i>TOTAL</i>	\$6,946.81

7. All of the time and expense incurred in the Action are reflected in the books and records of Strom Law Firm, L.L.C., 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 Strom Law Firm, L.L.C..

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



MARIO A. PACELLA

EXHIBIT A

Strom Law Firm, L.L.C.

Columbia, South Carolina

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Strom Law Firm, L.L.C. practices in the following areas of law:

Complex Litigation, Multi-District Litigation, Mass Torts, Personal Injury, Worker's Compensation, Nursing Home Malpractice, Pharmaceutical Liability, Products Liability, Consumer Protection, Toxic Torts, Premises Liability, Business Litigation, Social Security Disability, Business Formations, Tax Planning, State and Federal Criminal Defense, White Collar Crimes, Grand Jury Practice.

Firm Size: 6

J. Preston "Pete" Strom, Jr. (Principal) born Columbia, South Carolina, May 21, 1959; admitted to bar, 1984, South Carolina; U.S. District Court, District of South Carolina; U.S. Court of Appeals, Fourth Circuit. Education: University of South Carolina (B.A., 1981; J.D., 1984). Law Clerk to the Honorable Frank Eppes, Thirteenth Judicial Circuit, 1984-1985. Assistant Solicitor, Richland County Solicitor's Office, 1985-1986. Leventis, Strom & Wicker, Columbia, South Carolina, 1986-1988. Law Offices of J.P. Strom, Jr., 1998-1990. Partner: Bolt, Popowski, McCullouch & Strom, 1990-1993. United States Attorney for the District of South Carolina, 1993-1996 (Appointed by President Clinton). Member: South Carolina Bar (Member of the Board of Governors); South Carolina Association for Justice (Past President); American Association for Justice (Member of the Board of Governors); Southern Bar Association; South Carolina Criminal Defense Lawyer's Association; Fourth Circuit Judicial Conference; National Association of Former United States Attorneys; National Crime Victim Bar Association. Practice Areas: Complex Litigation; Class Actions; Criminal Defense; Federal Criminal Law.

Mario A. Pacella (Associate) born Buffalo, New York, 1972; admitted to bar, 1998, New York; 1999, Georgia; 2000, South Carolina, U.S. District Court, District of South Carolina and U.S. District Court, Northern and Southern Districts of Georgia; 2001, U.S. Court of Appeals, Fourth Circuit; 2002, U.S. District Court, Middle District of Georgia; 2007, United States Supreme Court. Education: College of William & Mary (B.A., 1994); College of William & Mary School of Law (J.D., 1997). 1997-1999, Law Clerk to the Honorable James E. Graham, United States Magistrate Judge (S.D. Ga.); 1999-2000, Assistant Public Defender, DeKalb County, Georgia. Member: South Carolina Bar; South Carolina Association for Justice; American Association for Justice; State Bar of Georgia. Practice Areas: Administrative Law; Civil Rights; Class Actions; Civil Litigation; Criminal Law; Social Security Disability.

John R. Alphin (Associate), born Clarksville, Tennessee, 1979; admitted to bar, 2005, South Carolina; U.S. District Court, District of South Carolina, 2007; U.S. Tax Court 2011. Education: University of South Carolina (B.S., Accounting, 2001; J.D., 2004), University of Florida (LL.M., 2005). Member: South Carolina Bar; South Carolina Association for Justice; American Association for Justice; American Bar Association; National Association of Bond Lawyers. Practice Areas: Business Formation; Tax Planning; Criminal Tax Law; Litigation.

Bakari T. Sellers (Associate) born in 1984 and raised in Denmark, South Carolina; admitted to bar 2010, South Carolina; Education: Morehouse College (B.A. 2005); University of South Carolina School of Law (J.D. 2008). Member: South Carolina Bar; South Carolina Association for Justice; National Association of Bond Lawyers.

Jessica L. Fickling (Associate) born in 1986 and raised in Ft. Lauderdale, Florida; admitted to the South Carolina bar in 2011, United States District Court for the District of South Carolina, 2011; Education: Mercer University in Macon, Georgia, (B.A. 2008); University of South Carolina School of Law, in Columbia, South Carolina, (J.D. 2011); Law Clerk to the Honorable J. Cordell Maddox, Jr., Circuit Court Judge for the 10th Judicial Circuit, (2010-2011); Member, South Carolina Bar Association; American Bar Association, South Carolina Association for Justice.

Alexandra Benevento (Associate) born in 1984 and raised in Buffalo, New York; admitted to the South Carolina bar in 2010, United States District Court for the District of South Carolina, 2010; Education: Clearwater Christian College in Clearwater, Florida, (B.S. 2005); University of South Carolina School of Law, in Columbia, South Carolina, (J.D. 2009); Member, South Carolina Bar Association; Richland County Bar Association; South Carolina Association of Criminal Defense Lawyers.

Class and Complex Actions Litigated by Attorneys at Strom Law Firm, LLC

Lead Counsel in Anderson v. Comprehensive Care Centers, Inc., et al, Case No. 02-CP-18-1756 in South Carolina consolidated before the Honorable Diane Shafer Goodstein, which resulted in a class action settlement.

Lead Counsel in Preisendorf v. JK Harris & Company, LLC, Case No. 05-CP-10-317 in South Carolina before the Honorable Perry M. Bucker III, which resulted in a class action settlement.

Liaison Counsel in In re American General Life and Accident Co. Industrial Insurance Litigation, MDL 1429, before the Honorable Cameron McGowan Currie which resulted in a mass tort settlement.

Lead counsel in Newsom, et al v. Blue Cross and Blue Shield of South Carolina, et al, 02-CP-40-4997, before the Honorable J. Ernest Kinard in Richland County, South Carolina. The case has resulted in a class action settlement in Love v. Blue Cross Blue Shield Association, 1:03cv21296, pending before the Honorable Federico Moreno in the

United States District Court for the Southern District of Florida where a class action settlement is pending. Strom Law Firm, LLC has served as Class Counsel in Love.

Class Counsel in Hospital Pricing Litigation before the Honorable Kenneth G. Goode, which resulted in settlements for four South Carolina hospital systems.

Class counsel in In re Insurance Brokerage Antitrust Litigation, MDL 1663 pending in the District of New Jersey, which resulted in several settlements.

Lead counsel in Webber, et al v. Intertape Polymer Group, Inc., 3:01-3396-19 in the United States District Court for the District of South Carolina, which resulted in a class action settlement.

Powell, et al v. Atlantic Coast Life Insurance Co., 00-CP-40-3723 in Richland County, South Carolina, which resulted in a class action settlement.

Class counsel in In re Industrial Life Insurance Litigation, MDL 1371, which resulted in a number of class action settlements.

Class counsel and Plaintiff's Liaison Counsel in In re Graniteville Cases, 1:06mn6000, which resulted in two class action settlements before the Honorable Margaret B. Seymour in the United States District Court for the District of South Carolina.

Class counsel and Steering Committee member in In re ConAgra Peanut Butter Products Liability Litigation, MDL 1845.

Class counsel in Waterbury Hospital v. U.S. Foodservice, Inc., 06-01657, which resulted in a class action settlement in the United States District Court for the District of Connecticut.

Lead Counsel in In re Payday and Title Loan Litigation, 2007-CP-40-7710, in Richland County, South Carolina, which resulted in several class action settlements.

Lead Counsel in In re South Carolina Pharmaceutical Pricing Litigation, 2006-CP-40-4394, pending in the Court of Common Pleas, Richland County, South Carolina.

Class Counsel in Demsheck v. The Ginn Development Company, 3:09-CV-335, in United States District Court for the Middle District of Florida, which resulted in a class action settlement.