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SPokane County Clerk

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**IN THE DISTRICT COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE**

ULISES LOPEZ, an individual, on behalf
of himself and all other similarly situated,

Plaintiff,

vs.

HOBAN & ASSOCIATES, LLC, a
Washington limited liability company,
D.B.A. COAST PROPERTY
MANAGEMENT, COAST SCREENING
SERVICES, COAST COLLECTION
SERVICES, COST MANAGEMENT
COMPANY, INC. (CMC); and CANYON
BLUFFS INVESTORS VII-1, LCC, a
Washington limited liability company;

Defendants.

Case No. 20-2-01929-32

**DECLARATION OF ATTORNEY
BRIAN CAMERON RE: ATTORNEYS'
FEES**

The undersigned, BRIAN G. CAMERON, on oath declares upon penalty of perjury under
the laws of the State of Washington that the following is true and correct:

1. I am over the age of 18, am competent to testify, and have personal knowledge of
the facts alleged in this Declaration.

DECLARATION OF ATTORNEY BRIAN
CAMERON RE: ATTORNEYS' FEES - 1

Cameron Sutherland, PLLC
827 W. 1st Ave., Ste 301
Spokane, WA 99201
(509) 315-4507

CO

1 2. I am a member in good standing admitted to practice by the Washington State Bar
2 Association.

3 3. I am a co-counsel of record for the Plaintiff, Ulises Lopez, and members of the
4 certified class in this matter.

5 4. To date, I have expended 37.3 hours on legal services directly related to the
6 claims against Defendants, including researching and developing individual and putative class
7 claims; compiling and analyzing evidence; drafting and editing pleadings; and engaging in
8 motion practice. True and correct copies of my contemporaneous time records are attached
9 hereto as **Exhibit A**.

10 5. This litigation commenced in 2020 and involved complex issues of law, including
11 many issues of first impression, specialized class action rules and procedures, and multiple
12 parties with varying profiles and interests.

13 6. Because the overwhelming majority of my practice involves representing
14 underrepresented and/or economically limited persons, my standard practice is to accept a
15 nominal retainer fee or no retainer fee from my clients. Virtually all of my fees are earned on a
16 contingency basis under fee-shifting statutory provisions.

17 7. Class action litigation requires enormous time and cost investment relative to
18 individual civil actions due to special procedural requirements, the expanded scope of discovery,
19 larger number of putative class members, and class administration. In many cases, such as this
20 one, these time and costs investments may be imposed over many years, deferring potential
21 recovery and presenting substantial economic risks to both the class representative and class
22 counsel.

23 8. My contingent hourly rate as class counsel is \$675.00 per hour. I have
24 investigated and am familiar with the rates charged by attorneys in Spokane, Washington. I

25
DECLARATION OF ATTORNEY BRIAN
CAMERON RE: ATTORNEYS' FEES - 2

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1 believe that a class action contingent rate of \$675.00 per hour for a firm principal and attorney
2 with my qualifications and experience is well within the market rate for this area. Due to the
3 highly specialized nature of class action practice, attorneys competent in this practice area
4 operate in a statewide marketplace, including Seattle-area counsel who are routinely approved at
5 more than \$1,000 per hour.

6 9. I have previously been approved for a class action contingency rate of \$625.00
7 per hour by courts in Spokane County. The requested rate reflects cost-of-living and inflationary
8 adjustments of eight percent between 2025, when this rate was awarded, and 2026.

9 10. Based upon this adjusted rate of \$675.00 per hour and the number of hours
10 expended, my total attorneys' fees amount to \$25,177.50.

11 11. I anticipate that I will expend another 4-6 hours of time preparing, presenting, and
12 debriefing final motions, plus an additional 2-3 hours to finalize class administration and close
13 this case, minimally requiring an additional six hours for a total hourly fee calculation of
14 \$29,227.25. These fees have been incorporated into Class Counsel's total requested fee award,
15 based on a percentage of the Common Fund determined through a mediated settlement between
16 the parties.

17 SIGNED and DATED this 9th day of March 2026 at Spokane WA.

18
19 *s/ Brian G. Cameron*
20 **BRIAN G. CAMERON, WSBA #44905**
21 *Co-counsel for Plaintiff and the Class*

22
23 DECLARATION OF ATTORNEY BRIAN
24 CAMERON RE: ATTORNEYS' FEES - 3

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Cameron Sutherland, PLLC
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CERTIFICATE OF SERVICE

I hereby certify that I caused to be served upon counsel of record at the address and in the manner described below a copy of the document to which this certificate is attached for delivery to the following:

<p>Eliot M. Harris, WSBA #36590 Maxwell B. Glasson, WSBA #51948 WILLIAMS, KASTNER & GIBBS PLLC 601 Union Street, Suite 4000 Seattle, WA 98101-2380 Email: eharris@williamskastner.com mglasson@williamskastner.com</p> <p><i>Attorneys for Defendants Hoban & Associates, LLC d/b/a Coast Property Management, Coast Screening Services, Coast Collection Services, Coast Management Company, Inc. (CMC), and Canyon Bluffs Investors VII-1, LLC</i></p>	<p><input type="checkbox"/> Via E-Service <input type="checkbox"/> Via Hand Delivery/Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via Electronic Mail <input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Overnight Courier</p>
<p>Dalton J. Reynolds, WSBA #54055 WINSTON & CASHATT LAWYERS, PS 601 West Riverside Ave., Suite 1900 Spokane, WA 99201 Tel: (509) 838-6131 Fax: (509) 838-1416 Email: djr@winstoncashatt.com</p> <p><i>Co-Counsel for Defendant Canyon Bluffs Investors VII-1, LLC</i></p>	<p><input type="checkbox"/> Via E-Service <input type="checkbox"/> Via Hand Delivery/Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via Electronic Mail <input type="checkbox"/> Via U.S. Mail <input type="checkbox"/> Via Overnight Courier</p>

DATED this 9th day of March 2026.

s/ Bonnie J. Morey
Bonnie J. Morey, Legal Assistant

DECLARATION OF ATTORNEY BRIAN
CAMERON RE: ATTORNEYS' FEES - 4

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EXHIBIT A

TIME COMPILATION

Lopez v. Hoban & Associates, LLC, et al.
 Spokane Superior Court No. 20-2-01929-32
 Brian G. Cameron

CLIENT	DATE	DESCRIPTION	TIME	RATE	TOTAL
Lopez, Ulises	10/20/20	Rvw. CLT narrative, facts, evidence; survey applicable statutory/case law re: prohibited lease terms	2.5	675.00	1,687.50
Lopez, Ulises	10/26/20	CONF CC/plgl. re: discovery responses	0.5	675.00	337.50
Lopez, Ulises	12/15/20	CONF CC re: On-Site subpoena	0.5	675.00	337.50
Lopez, Ulises	01/15/21	Rvw./edit PFs M/Compel	1.2	675.00	810.00
Lopez, Ulises	02/08/22	Case rvw. CONF re: discovery status, litigation strategy/schedules, M/Continue	1.0	675.00	675.00
Lopez, Ulises	05/16/22	Rvw, DFs CR68 offer; rsch. authorities and standards for CR68 application to class action litigation	1.1	675.00	742.50
Lopez, Ulises	01/05/23	Rvw/edit PFs M/Class Certification	2.2	675.00	1,485.00
Lopez, Ulises	02/13/23	CONF CC re: case status, litigation strategy/schedules	0.5	675.00	337.50
Lopez, Ulises	02/14/23	CONF CC re: report on case status, procedural options/recommendations	0.5	675.00	337.50
Lopez, Ulises	02/20/24	CONF CC re: case status, KDM withdrawal/substitution, reallocations, reschedules	0.6	675.00	405.00
Lopez, Ulises	03/11/24	CONF CC re: ORCA defenses, privity, class litigation strategy	0.5	675.00	337.50
Lopez, Ulises	03/13/24	Rvw./verify DF RealPage Reply re M/Dismiss, M/Strike	0.6	675.00	405.00
Lopez, Ulises	04/30/24	CONF CC re: discovery	1.0	675.00	675.00
Lopez, Ulises	06/06/24	Compile/rvw. certified class member data	1.0	675.00	675.00
Lopez, Ulises	06/18/24	Outline ER408 offer for class settlement	1.0	675.00	675.00
Lopez, Ulises	07/30/24	Rvw./verify DF Real Page M/Judgment on Pleadings	1.1	675.00	742.50
Lopez, Ulises	10/03/24	CONF CC re: mediation objective/strategy	0.5	675.00	337.50
Lopez, Ulises	01/17/25	CONF CC re: case status/strategy, ER408	0.6	675.00	405.00
Lopez, Ulises	02/06/25	CONF CC re: case status/strategy; rsch. authorities re: prohibited lease provisions, defenses, analogous statutes	2.5	675.00	1,687.50
Lopez, Ulises	02/11/25	CONF CC re: motion practice	0.5	675.00	337.50
Lopez, Ulises	02/13/25	CONF CC re: ER408	0.5	675.00	337.50
Lopez, Ulises	05/11/25	Rvw./edit mediation memo	2.0	675.00	1,350.00
Lopez, Ulises	05/13/25	Rvw./annotate mediation briefs; verify DF narrative re: application of RCW, procedural posture; CONF CC	2.5	675.00	1,687.50
Lopez, Ulises	05/15/25	Prepare/present/participate mediation; debrief CC	9.0	675.00	6,075.00

Lopez, Ulises	06/11/25	Rvw./edit settlement documents	2.0	675.00	1,350.00
Lopez, Ulises	03/05/26	Compile time/costs re: Fairness HRNG	0.5	675.00	337.50
Lopez, Ulises	03/06/26	Draft DECL reas. Fees	0.9	675.00	607.50
TOTAL (date)			37.3	675.00	25,177.50