THE HONORABLE KRISTIN RICHARDSON
Department 52
Noted for Hearing: May 24, 2019
With Oral Argument

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

DANA ROHDE and MICHAEL WILSON, on their own behalf and on the behalf of all others similarly situated, Plaintiffs, v. T-MOBILE USA, INC., a Delaware corporation, Defendant.	NO. 15-2-30631-6 SEA **DECLARATION OF GREGORY A. WOLK IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Gregory A. Wolk, declare as follows:

1. I am an attorney at Rekhi & Wolk, P.S., co-counsel for Plaintiff and the class members in this matter. I have personal knowledge of the following facts and if called to testify could and would competently do so.

2. I believe the Settlement Agreement reached in this case to be fair, reasonable, and adequate, and in the best interests of the Class.

3. Although the parties settled before trial, Rekhi & Wolk has invested a substantial amount of time and resources investigating, litigating, and negotiating the resolution of this action. To date, Rekhi & Wolk has spent more than 353 hours on this matter and incurred a total of more than $157,740 in lodestar.

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4. The following table identifies the attorneys from my firm who worked on this case and for whom the recovery of fees is sought. For each of the timekeepers below, I have stated the current hourly rate, the number of hours billed, and the total amount of fees. These hours are derived from my firm's contemporaneously created time records.

Name and Position	Rate	Hours	Total
Gregory A. Wolk Partner J.D. from Univ. of Washington School of Law, 1998	$450	144.5	$65,025.00
Hardeep Rekhi Partner J.D. from Tulane Law School, 2003	$450	205.3	$92,385.00
Zoe Kahn Legal Assistant B.A. New York University 2014	$100	3.3	$330.00

5. Rekhi & Wolk sets its rates for attorneys and staff members based on a variety of factors, including among others: the experience, skill and sophistication required for the types of legal services typically performed; the rates customarily charged in similar matters; the rates customarily charged by other lawyers of similar skill and experience; and the experience, reputation, and ability of Rekhi & Wolk's attorneys and staff members.

6. Our lodestar calculations are based on our current standard hourly rates. Mr. Rekhi and I each began charging $450 per hour of our work beginning on January 1, 2018 because this is the hourly rate we charge our "billing clients" (as opposed to contingent-fee based clients) who have agreed to pay for our work. Courts have repeatedly approved fee requests by Rekhi & Wolk that were based the standard rates of the firm at the time of the application. Here is a recent sample of courts that have approved Rekhi & Wolk's rates as reasonable:

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- In January 2018, in *Johnson v. JT Marketing Corp.*, King County Superior Court Case No. 17-2-10264-4 KNT, after reviewing a disputed motion for approval of fees in a single plaintiff wage and hour case, the Honorable David Keenan found that Mr. Wolk's and Mr. Rekhi's standard hourly rates at the time, (the motion requesting fees was filed in December 2017), were reasonable. Our hourly rate that was approved by the Court was $425 per hour.

- In October 2017, in *Helde et al. v. Knight Transportation, Inc.*, Western District of Washington Case No. 2:12-cv-00904-RSL, after reviewing a disputed motion for approval of fees in a wage and hour class action, the Honorable Robert Lasnik found that Mr. Wolk's and Mr. Rekhi's standard hourly rates at the time, (the motion requesting fees was filed in June 2017), were reasonable. Our hourly rate that was approved by the Court was $425 per hour.

- In November 2016, the Honorable Timothy Bradshaw approved Rekhi & Wolk's requested attorneys' fees in *Rogers v. Recovery Centers of King County*, King County Case No. 14-2-32248-8 SEA, a wage and hour class action. The Court reviewed Mr. Wolk's and Mr. Rekhi's standard rate, which was $400 per hour at the time, and approved the rates as reasonable.

- In June 2016, the Honorable Bruce Heller approved Rekhi & Wolk's requested attorneys' fees in *Humphrey v. Assisted Living Concepts, LLC*, King County Case No. 15-2-22138-8 KNT. The Court reviewed and approved the requested fees based Mr. Wolk's standard rate of $400 per hour at that time (Mr. Rekhi did not submit a fee request).

7. Rekhi & Wolk is a law firm in Seattle, Washington that focuses on successfully representing employees against all sizes of employers. We have helped public and private employees from almost all backgrounds, experiences, and pay scales—from CEOs, royalty, and athletes to scores of "blue-collar" workers. We have litigated numerous cases through trial and appeal.

8. I graduated with a J.D. from the University of Washington School of Law in 1998, where I was an editor on law review. After law school, I worked as a litigation attorney specializing in employment law in Seattle. In 2011, I founded my own firm and, in 2013, I founded Rekhi & Wolk with my partner Hardeep Rekhi. I focus my practice in the area of plaintiff-side employment law, handling a variety of discrimination, harassment, wrongful-termination, wage-and-hour, and retaliation issues. I also co-wrote a chapter on employment

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discrimination for the Washington State Association of Justice (WSAJ) Employment Law Deskbook. Over the past sixteen years, I have developed significant experience in the litigation of employment disputes, including wage and hour class actions. I have prevailed in both state and federal court at trial and on appeal. For additional information regarding my qualifications and experience, please see paragraphs 3-4 and 12-15 of my declaration in support of preliminary approval filed with the Court on May 3, 2018.

9. My partner, Hardeep Rekhi is a graduate of Tulane Law School, cum laude. He has always focused his practice on employment law, and he has taken several cases to trial. In 2006, he started his own law practice primarily focusing on representing plaintiffs in employment disputes. In 2013, Mr. Rekhi and I founded Rekhi & Wolk. Mr. Rekhi serves on the Board of Directors of WELA and the Board of Governors for WSAJ. He has contributed to several publications on topics of employment rights, including co-authoring a chapter on race discrimination for the WSAJ Employment Law Deskbook. During the past thirteen years, Mr. Rekhi has developed significant experience in the litigation of employment disputes, particularly wage and hour class actions. Since 2013, Mr. Rekhi has successfully prosecuted several wage and hour class actions as lead or co-lead counsel. He has also served as a pro tem judge for King County District Court since 2016. For additional information regarding Mr. Rekhi's qualifications and experience, please see paragraphs 5-15 of my declaration in support of preliminary approval filed with the Court on May 3, 2018.

10. Since the beginning of this case in January 2012, Rekhi & Wolk has worked with no guarantee of being compensated for our time and efforts. Payment of Rekhi & Wolk's fees has always been contingent on successfully obtaining relief for the Plaintiffs and class members. As a result, there was a substantial risk of non-payment, particularly in light of the legal challenges involved in litigating this case. Work on this case has necessarily been to the

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exclusion of work on other matters that likely would have generated fees. Rekhi & Wolk has also been denied use of the fees and costs they earned over the course of this case.

11. Rekhi & Wolk has incurred out-of-pocket litigation expenses totaling $5,240.95, to cover expenses related to legal research, investigation, discovery, travel, and mediation fees. The following chart summarizes Rekhi & Wolk's litigation costs:

Type of Cost	Amount
Travel	$9.17
Computer research (Westlaw and Pacer)	$241.00
Court reporter and transcript costs	$1,132.00
Mediation costs	$3,858.78
TOTAL	**$5,240.95**

12. Rekhi & Wolk anticipates contributing additional time and resources to this case, including drafting final approval papers and continuing to oversee settlement administration.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this declaration was executed in Seattle, Washington, on the 1st day of March, 2019.

By: /s/ Gregory A. Wolk, WSBA #28946
Gregory A. Wolk, WSBA #28946

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