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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SIMON MAJDIPOUR, PAMELA AUSTIN,
BRIAN FUCHS, CHARLES MANIS, JASON
MANOWITZ, and MARVINA ROBINSON,
individually, and on behalf of a class of
similarly situated individuals,

Plaintiffs,

v.

JAGUAR LAND ROVER NORTH AMERICA,
LLC,

Defendant.

No.: 2:12-cv-07849-MCA-LDW

**DECLARATION OF PAYAM SHAHIAN
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

I, Payam Shahian, under penalty of perjury, declare as follows:

1. I am the Managing Partner/Shareholder of Strategic Legal Practices, APC (“Strategic”) in Los Angeles, California, counsel of record for Plaintiffs Simon Majdipour, Pamela Austin, Brian Fuchs, Charles Manis, Jason Manowitz and Marvina Robinson. My knowledge of the information and events described herein derives from a combination of my personal knowledge and a careful review of the file, relevant court records and communications with other Plaintiffs’ counsel, and if called as a witness, I could and would competently testify thereto. I respectfully submit this Declaration in support of Plaintiffs’ Motion for Final Approval of Class Action Settlement.

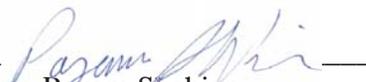
2. Mazie Slater Katz & Freeman, LLC and Strategic Legal Practices, LLC are Class Counsel in this matter.

3. The instant Settlement is the product of years of thorough investigation and research into the alleged Suspension Defect. Prior to the filing of this action, Class Counsel devoted significant time to investigating the alleged Suspension Defect. To learn about the alleged defect and its consequences, Class Counsel, among other things, created a webpage notifying potential class members of the alleged defect, fielded inquiries from prospective class members during the course of this litigation, reviewed consumer complaints on the internet and to the National Highway Traffic Safety Administration website, reviewed JLRNA manuals and technical service bulletins discussing the alleged defect, identified potential defendants, and conducted research into potential causes of action and other cases where the same or similar defects were alleged.

4. During the litigation, Class Counsel engaged in substantial discovery, including written and third party discovery. Additionally, Class Counsel took a deposition pursuant to Fed. R. Civ. Pro. 30(b)(6) of a witness from Jaguar Land Rover Automotive, PLC (the UK designer and manufacturer of the Class Vehicles) regarding the alleged Suspension Defect and associated issues. Class Counsel also retained and met with an expert witness; and attended Defendant's inspection of one of Plaintiffs' vehicle.

5. I believe that under the circumstances, the proposed Settlement is fair, reasonable, and adequate and in the best interest of the Class Members. Although I strongly believe in the merits of Plaintiff's case, I also believe that continuing this Action poses significant risks. My opinion takes into account consideration of benefits received in other similar class actions I have litigated and/or are familiar with, as well as the risks inherent in consumer class actions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 9, 2020 at Los Angeles, California

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Payam Shahian