

1 Joshua Katz (SBN 194512)
Law Office of Joshua Katz
2 144 South E Street, Suite 206
Santa Rosa, California 95404-4794
3 707-546-4510 telephone
4 707-575-6014 facsimile
jkatz@sonomalegal.com

5 Todd Espinosa (SBN 209591)
Law Office of Todd Espinosa
6 2000 Broadway Street
7 Redwood City, California 94063
8 650-241-3873 telephone
9 650-409-2550 facsimile
tie@toddespinosalaw.com

10 Julie C. Erickson (SBN 293111)
Elizabeth A. Kramer (SBN 293129)
11 Kevin M. Osborne (SBN 261367)
12 Erickson Kramer Osborne LLP
959 Natoma Street
13 San Francisco, CA 94103
415-635-0631 telephone
14 415-599-8088 facsimile
15 julie@eko.law, elizabeth@eko.law,
kevin@eko.law

16
17 *Attorneys for Individual and Representative Plaintiffs*

18 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
19 FOR THE COUNTY OF SONOMA
20 CIVIL UNLIMITED

21 SHARON FELKER; HERMAN GRISHAVER;
22 EDGAR CRUZ SORIANO; and JEANACE
23 ZETINO, individually and on behalf of other
24 similarly situated individuals,

25 Plaintiffs,

26 vs.

27 JRK RESIDENTIAL GROUP, INC.; JRK
28 PROPERTY HOLDINGS, INC.; and DOES 1-
100,

29 Defendants.
30
31
32

Case No.: SCV-267587

**DECLARATION OF HERMAN
GRISHAVER**

Complaint Filed: December 22, 2020
Trial Date: N/A

1 1. My name is Herman Grishaver, M.D.

2 2. I was a resident of JRK's apartment complex in Petaluma, California, known as
3 The Vineyard and later The Grove, from 2017 to 2020. I have been a named plaintiff in this case
4 since the case was filed in December 2020.

5 3. I estimate the total amount of time I spent on tasks related to this case is 55 hours
6 or more. These tasks included my deposition, assisting in the preparation of discovery responses
7 and amended responses, collecting documents, reading documents in the case, and interacting
8 with my lawyers. That total does not include at least 8 hours that I estimate having spent to find
9 attorneys to take the case.

10 4. On November 2, 2023, JRK's lawyers took my deposition. The deposition lasted
11 over seven and a half hours, including a one-hour lunch break. I spent over seven additional
12 hours before the deposition preparing on my own and with my attorneys. I estimate in total I
13 spent about 15 hours in deposition and preparing for the deposition.

14 5. At various times during the case, I was required to participate in discovery. I read
15 through lengthy interrogatories and requests for documents and admissions from JRK and
16 assisted my lawyers in preparing responses and amended responses. I read through all the
17 responses to verify that they were accurate. I estimate taking approximately 10 hours of
18 reviewing multiple sets of discovery responses.

19 6. I also had to gather documents for the case and send them to my lawyers. These
20 included sensitive financial documents, pictures, records of my tenancy at JRK, and other
21 documentation about my tenancy. Before seeking counsel, I had communicated with JRK about
22 what I felt were improper rent charges and I also gathered documentation related to those efforts.
23 I estimate taking approximately 10 hours to collect these records and prepare them to send to my
24 lawyers.

25 7. I monitored the progress of the case over the past five years, including filings in
26 the case, orders by the Judge and settlement negotiations. I estimate taking approximately 10
27 hours to monitor these case developments and communicate with my lawyers about these
28 matters.

29 8. During the case, I had many time-consuming calls and meetings with my lawyers.
30 Over the past five years, I would estimate the number of calls and meetings I had with my
31 lawyers was more than 20. In total, I estimate the time I spent speaking with my lawyers is at
32 least 10 hours, besides the calls and meetings described above.







H. Grishaver Decl ISO Mtn Preliminary Approval

Final Audit Report

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