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Class Counsel and Attorneys for Plaintiffs

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

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

Plaintiffs,

vs.

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

Defendants.

Case No.: SCV-267587

**DECLARATION OF TODD ESPINOSA IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS AND
SERVICE AWARDS**

Judge: Hon. Patrick M. Broderick

Date: August 19, 2026

Time: 3:00 p.m.

Dept. 16

Complaint Filed: December 22, 2020

Trial Date: N/A

1 1. I, Todd Espinosa, am licensed to practice before the Courts of California and am
2 an attorney for Plaintiffs Sharon Felker, Herman Grishaver, Edgar Cruz Soriano, and Jeanace
3 Zetino, and the certified classes in the present action. I respectfully submit this declaration in
4 support of Plaintiffs' motion for final approval of the class action settlement and an award of
5 attorneys' fees, reimbursement of expenses, and Plaintiffs' service awards in the above-
6 captioned class action. I make the following declaration based on my own personal knowledge
7 and, where indicated, based on information and belief that the following statements are true. If
8 called upon as a witness, I could and would competently testify as follows.

9 2. I have been actively involved in the litigation of this matter, which began as a
10 putative class action on behalf of tenants at Defendants' residential buildings, in relation to
11 allegations of price gouging, unlawful rent increases, and other unlawful conduct, since 2020.

12 3. I have extensive experience in complex litigation, including class action litigation,
13 and have represented plaintiffs in class actions and class action settlements.

14 4. I was admitted to the Bar in December 2000 and have practiced primarily in the
15 areas of tenants' rights, housing discrimination, consumer protection and complex plaintiff-side
16 litigation for 25 years. Some of the representative matters in my current practice include:
17 *Bischoff, et al. v. Brittain, et al.*, Case No. 2:14-cv-01970 (E.D. Cal.) (housing discrimination
18 action by tenants and a fair housing enforcement organization involving attempted eviction
19 from a Sacramento-area apartment complex); *Castellano, et al. v. Access Premier Realty, et al.*,
20 Case No. 1:15-cv-00407 (E.D. Cal.) (action by a former tenant and a fair housing enforcement
21 organization for refusal to provide reasonable accommodation of disability); *Pertz v. Heartland*
22 *Realty Investors, et al.*, Case No. 3:19-cv-06330 (N.D. Cal.) (sex harassment action by former
23 tenant of a federally subsidized housing complex); *United States ex rel. Grinner v. Ogden*, Case
24 No. 4:20-cv-01691 (N.D. Cal.) (False Claims Act *qui tam* action against a Section 8 Housing
25 Choice Voucher landlord involving additional individual claims for refusal to provide
26 reasonable accommodation of disability and unlawful security deposit withholding); *Kelley v.*
27 *Related Management Co., et al.*, Case No. 3:22-cv-04458 (N.D. Cal.) (disability discrimination
28 action by tenant of a federally subsidized housing complex).

29 5. I previously worked as a staff attorney and fellow with the National Housing Law
30 Project (a housing law and policy center in the Bay Area), litigator with Girard Gibbs LLP (a
31 plaintiffs' class action law firm in San Francisco), and a Deputy Attorney General in the
32 consumer protection section of the California Department of Justice. I served as a law clerk to

1 the Hon. Claudia Wilken of the U.S. District Court for the Northern District of California and a
2 civil legal research attorney with the Superior Court of California, County of Santa Clara. I
3 received a law degree from Harvard Law School and an undergraduate degree from Harvard
4 College. I also hold a master's degree in city planning from U.C. Berkeley.

5 6. My published articles and writings on federal housing programs, fair housing law
6 and federal discovery and civil procedure include: National Housing Law Project, *False HOPE:
7 A Critical Assessment of the HOPE VI Public Housing Redevelopment Program* (2002); *A Tale
8 of Two Fair Housing Disparate Impact Cases* (with Ann B. Lever), 15 A.B.A. J. Affordable
9 Housing & Commun. Dev. L. 257-275 (2006); and *Limiting Evasive Discovery: A Proposal for
10 Three Cost-Saving Amendments to the Federal Rules* (with Daniel C. Girard), 87 Denv. U. L.
11 Rev. 213, 473 (2010).

12 7. I currently serve on the board of Housing and Economic Rights Advocates, a
13 California-wide non-profit legal services provider based in Oakland. In 2020, I was elected as a
14 member of the American Law Institute (ALI).

15 8. My current hourly billing rate is \$875.

16 9. My hourly rate is my current usual and customary billing rate. Based on my
17 experience as a legal practitioner, I believe that it is in line with rates for attorneys of
18 comparable skill, experience, and qualifications that have been approved by federal courts
19 within the Ninth Circuit, including California state and federal courts.

20 10. In 2024, I was awarded attorney fees at a rate of \$825 per hour on a contested fees
21 motion in *Kelley v. Related Management Co., et al.*, Case No. 3:22-cv-04458-SK (N.D. Cal.), a
22 housing discrimination action brought on behalf of a subsidized housing tenant in San
23 Francisco. In 2019, I was awarded attorney fees based on a claimed \$525.00 hourly rate in a *qui
24 tam* action against a subsidized housing landlord, *United States ex rel. Guerra v. Nguyen*,
25 No.18-cv-01666-NC (N.D. Cal.), Dkt. 72. In 2011 and 2012, a federal district court awarded
26 attorney fees in two consumer class actions based in part on my work representing the plaintiffs
27 in those cases at a rate of \$480.00 per hour: *Berrien, et al. v. New Raintree Resorts, et al.*, Case
28 No. CV 10-03125 CW (N.D. Cal.), Dkt. No. 88 and Dkt. No. 137; *Wixon, et al. v. Wyndham
29 Resort Development Corp., et al.*, Case No. CV 07-02361 JSW (N.D. Cal.), Dkt. No. 696 and
30 Dkt. No. 1344.

31 11. I, along with co-counsel Joshua Katz of the Law Office of Joshua Katz, began
32 investigating potential claims that led to this lawsuit in 2020. The investigation eventually

1 focused on claims that could be brought on a class-wide basis. The investigation culminated in
2 the complaint filed on December 22, 2020. In 2023, we added Erickson Kramer Osborne LLP to
3 co-counsel through completion of discovery, class certification, dispositive motions, experts,
4 settlement negotiations and, if applicable, trial.

5 12. I prepared time records contemporaneously throughout this litigation. I have
6 carefully reviewed my time records for the case and believe that they fairly reflect the amount
7 of time spent in this matter. I believe I had an additional amount of time which was not
8 accounted for, simply because I often took calls, had meetings or undertook tasks which were
9 never memorialized. I also exercised billing discretion in recording billable hours. Where
10 appropriate, I selectively reduced or eliminated time believed to exceed what was necessary for
11 a given task.

12 13. As of June 30, 2026, I have recorded a total of 1,779.2 billable attorney hours
13 litigating this case.

14 14. My total lodestar in this case is \$1,556,800, based on my \$875 hourly rate and
15 1,779.2 billable hours.

16 15. Alongside Mr. Katz, I have served as attorney for Plaintiffs since 2020. With Mr.
17 Katz, I conducted the pre-filing investigation of this case, interviewing putative class members,
18 researching Defendants, the industry, and Plaintiffs' potential claims, reviewing client
19 documents, and conferring regarding strategy. I spent significant time drafting and editing the
20 initial and first amended complaints in this litigation, which needed to be carefully framed in a
21 manner that would support class certification. I was primarily responsible for drafting and
22 performing legal and fact research for Plaintiffs' successful oppositions to Defendants' second
23 demurrer and motion to strike, Plaintiffs' successful demurrer to Defendants' answer, Plaintiffs'
24 successful opposition to Defendants' motion for sanctions, Plaintiffs' successful opposition to
25 Defendants' motion for summary adjudication and Plaintiffs' motion to compel discovery
26 (which was not ruled on prior to settlement). I worked closely with co-counsel on Plaintiffs'
27 class certification motion, performing much of the legal research and writing and appearing on
28 behalf of the Plaintiffs at hearings. I also worked actively on discovery-related tasks in the case.
29 I assisted in all aspects of preparations for the taking and defending of depositions and attended
30 all depositions in the case. Along with co-counsel, I drafted, reviewed, and edited all written
31 discovery, and met and conferred with defense counsel about discovery matters. I also reviewed
32 Defendants' responses to Plaintiffs' discovery requests and reviewed Defendants' extensive

document productions. I conferred with expert data consultants regarding Plaintiffs' claims. Along with Mr. Katz, I was a principal contact with the Plaintiffs in this matter and communicated with them to update them about the case and discuss settlement offers. I actively participated in Plaintiffs' mediation and settlement efforts. I read and analyzed Defendants' mediation briefs; consulted with data experts retained by Class Counsel to analyze Defendants' voluminous rental data; strategized and discussed with co-counsel the prospects of settlement and proposed mediators; helped to formulate mediation strategy; attended both mediation sessions; participated in the lengthy negotiation and drafting of settlement terms for the long-form agreement; and provided assistance to the Settlement Administrator. I have also actively participated in the research and drafting of papers for the initial and renewed motions for preliminary settlement approval and this final approval motion.

16. Records of my time and expenses are proprietary and contain confidential information subject to attorney-client privilege and work-product protection, but they will be made available for the Court's review upon request.

17. I have received no compensation for the hours I have worked on this case. Working without compensation on a large case for this time has had an adverse financial impact on the economic health of my practice. This is not stated as a complaint, but for the Court's consideration in determining an appropriate attorney fee award.

18. To date, I have incurred \$35,818.07 in litigation expenses in this case, which consist of expert fees, data expenses, copying expenses, translation expenses, and other customary litigation expenses. I have not received any payment or reimbursement for these expenses.

Dated this July 20, 2026.



Todd Espinosa