Case	2:13-cv-02529-MMM-VBK [Document 159-9 #:2479	Filed 02	/27/15	Page 1 of 3	Page ID
1 2 3 4 5 6 7	Dara Tabesh (SBN 23043) dara.tabesh@ecotechlaw.c EcoTech Law Group, P. 333 First Street, Suite C San Francisco, California Telephone: (415) 503-916 Facsimile: (415) 651-8639 Attorneys for Plaintiffs	eom C. 94105 4				
8		ED STATES D				
9	CENTRAL DISTRI	CT OF CALIF	ORNIA-	—WES	TERN DIV	ISION
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11	ALI ASGHARI, AUGUS LAMIA, BARBARA CAI	ΓΙΝΟ LVER,			3-02529-M	MM-(JEMx)
12	ALI ASGHARI, AUGUST LAMIA, BARBARA CAI SUPALAK PRASOBRAT DANIEL TRAN, individu behalf of a class of similar	ANA, and ally, and on	CLASS			
13	behalf of a class of similar individuals,				M. Morrow	» A
14	Plaintiffs,			HINS	ON OF DAI UPPORT O	F
15	VS.			VAL (MOTION I OF CLASS A T AND APP	CTION
16 17	VOLKSWAGEN GROUF AMERICA, INC., VOLKS AG, AND AUDI AG,	OF SWAGEN	FOR A'	TTORI	NEYS' FEES ND COSTS	5,
18	AG, AND AUDI AG, Defendants		Date: Time:	May 4	4, 2015 am	
19	Defendants		Place:	Courtro	oom 780	
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DECLARATION OF DARA TABESH ISO PLAINTIFFS' MOTION FOR FINAL APPROVAL

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DECLARATION OF DARA TABESH

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I, Dara Tabesh, declare:

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27 28 I am an attorney admitted to the Bar of the State of California and

- the United States District Court, Central District of California. I am a Shareholder of EcoTech Law Group P.C. ("EcoTech"), counsel of record for Plaintiffs in the above-captioned matter. 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 co-counsel, and if called as a witness, I could and would competently testify thereto. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Application for Attorneys' Fees, Expenses, and Costs.
- 2. I graduated from the University of California, Hastings College of the Law in 2003.
- Since 2009, I have represented consumers in over 10 automotive 3. defect class action matters.
- In Keegan et al. v. American Honda Motor Co., Inc., 284 F.R.D. 4. 504 (C.D. Cal. 2012), I, along with co-counsel, certified a multi-state class of owners and lessees of 2006-2007 Honda Civics and 2006-2008 Honda Civic Hybrids with defective rear suspensions.
- 5. I have also been part of and helped achieve preliminary or final approval of settlements on behalf of thousands of class members. See, e.g., In re Mini Windshield Actions (Ehrlich v. BMW), No. 10-cv-01151-ABC (C.D. Cal. 2011) (nationwide class action settlement on behalf of consumers of MINI Coopers for alleged windshield defects).
- During the regular course of business, I have contemporaneously tracked my time in this action. Based on these contemporaneous time records, which were recorded in one-tenth increments, my firm has billed a total of 148.5

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STATUS

Partner (P)

Associate (A)

Senior Counsel (SC)

Former Associate (FA)

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hours litigating this action, for a total lodestar of \$83,160.

7. The chart below sets forth my regular billable hourly rate (which is commensurate with the prevailing rates among firms that regularly litigate class actions) and my hours (by category).

Name	1	2	3	4	5	6	Current Hourly Rate	Hours	Lodestar
Dara Tabesh	0.3	1.0	136.3	0.8	10.3	0.0	\$560.00	148.5	\$83,160.00

CATEGORIES

- Pre-filing investigation and pleadings
- Post-filing investigation and discovery
- Motion to Dismiss/Motion to Transfer
- Mediation/Settlement Negotiation/Settlement Agreement
- Settlement/Fee Motions
- Class Member Communication/Supervision of Settlement/Notice/Benefits

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 27, 2015 at San Francisco, California.