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SUPERIOR COURT FOR THE STATE OF WASHINGTON
COUNTY OF YAKIMA

THEODORE STRONG,

Plaintiff,

v.

NUMERICA CREDIT UNION,

Defendant.

NO. 17-2-01406-39

DECLARATION OF ALEXANDER B. TRUEBLOOD IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

I, Alexander B. Trueblood, declare as follows:

1. I am an attorney at law licensed to practice in Washington, California, and Texas. I have personal knowledge of the facts stated herein, and if called as a witness, would competently testify thereto. I am the attorney of record for the plaintiff, Theodore Strong, and the proposed Class along with the Terrell Marshall Law Group PLLC.

Education and Background

2. I am the principal of the Trueblood Law Firm, and am a specialist in consumer law and class actions. I graduated with honors from the University of California, Berkeley with a B.A. in English in 1984. I obtained my J.D. from UCLA Law School in 1990, and graduated with membership in the Order of the Coif. I was awarded two American Jurisprudence awards, for being first in my class, in the subjects of Legal Research and Writing, and Contracts. I was also Chief Comments Editor of the UCLA Environmental Law Journal.

1 3. I was admitted to the California Bar in 1990. I worked at the law firm of
2 Morrison & Foerster LLP for the period 1990 through 1993 as an associate in the litigation
3 department of the Los Angeles office. I worked on complex disputes between major
4 corporations in the areas of patent law, antitrust, and insurance coverage. Subsequently, I
5 joined the firm of Love & Bosserman, specialists in plaintiff's employment and discrimination
6 cases, as an associate in 1993. Gordon Bosserman is the former managing partner of the Los
7 Angeles office of Baker & Mackenzie. At Love & Bosserman, I handled a heavy caseload of
8 contested wrongful termination, racial and gender discrimination, fraud, and unfair business
9 practices cases.

10 4. In 1996, I began working for Chavez & Gertler, LLP in San Francisco,
11 California, a nationally known plaintiff's consumer class action firm. Mark Chavez, one of the
12 named partners, is on the Board of Directors of the National Association of Consumer
13 Advocates, and the firm is recognized as a leader in consumer class actions and consumer law.
14 Jonathan Gertler, the other partner, pioneered the first products liability claims against major
15 needle manufacturers, on behalf of health worker victims of AIDS needlestick injuries. At
16 Chavez & Gertler, I specialized in class action consumer litigation, on behalf of consumers,
17 working on scores of class actions and private attorney general actions brought under
18 California's UDAP provision, the Unfair Competition Law. I handled several class action
19 cases involving auto lease overcharges and abuses in force-placed insurance programs. In 1999,
20 I was offered partnership at Chavez & Gertler, but ultimately decided to depart and form my
21 own firm, the Trueblood Law Firm.

22 5. Starting in 2016, I expanded my law practice to encompass Washington and
23 Texas, and I became licensed in those jurisdictions at that time. The Trueblood Law Firm now
24 has offices in Washington, California, and Texas, and brings class and individual cases
25 principally in the areas of consumer finance and auto repossessions.

1 6. Over the last 20 years, I have been a leader in the plaintiffs' class action
2 consumer bar in California. I have been involved on the plaintiffs' side in much of the class
3 action litigation in California since 1998 involving post-repossession notice violations of the
4 UCC and California's Rees-Levering Automobile Sales Finance Act. I have been counsel in
5 class action and private attorney general cases brought against virtually every lender in the
6 country who operates in California, for defective post-repossession notices. I was one of the
7 first lawyers in the state to identify and prosecute these class action cases. While at Chavez &
8 Gertler, I filed and was primarily responsible for approximately 40 such class actions against
9 almost every major lender (including Chrysler, Ford, Nissan, Toyota and GMAC) doing
10 business in California, all of whom had failed to comply with the deficiency provisions of
11 Rees-Levering.

12 7. Since 2001, I have continued to expand my consumer class action practice. I
13 have litigated approximately 100 class action cases involving violations of the post-
14 repossession notice requirements of the UCC, under state retail installment sales acts, and other
15 consumer protection laws. The resulting settlements in the post-repossession notice cases have
16 almost always resulted in full relief to class members. The National Association of Consumer
17 Advocates has praised these settlements in California as a landmark in consumer advocacy.

18 8. Some examples of major consumer cases I have litigated include:

- 19 • Ramirez v. Toyota Motor Credit Company (Alameda Superior Court), a national
20 class action for Vehicle Leasing Act violations for TMCC's failure to
21 adequately disclose the capitalized cost in leases to consumers, in which
22 TMCC's potential exposure was in the billions of dollars.
- 23 • Vann v. Fireside Thrift (San Francisco Superior Court), a class action
24 challenging the forced-place insurance practices of Fireside Thrift in connection
25 with automobile loans, in which Fireside's liability was in the millions.
- 26 • Mortera v. Ford Motor Credit Company (Santa Clara Superior Court), a class
27 action brought to remedy Ford Credit's failure to provide post-repossession
28 notices in compliance with the Rees-Levering Act, in which summary judgment
29 was obtained and Ford Credit forced to pay a multi-million dollar settlement to
30 class members.

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- Wong v. Triad Financial Corporation (Los Angeles Superior Court), a class action brought to obtain an injunction to stop Triad Financial from impersonating police officers and making threats of arrest to tens of thousands of borrowers. As a result of this case, which gained significant media attention, Triad fired high-level personnel, stopped the offending practice, and closed its office in California.
 - Paris v. Westlake Financial Services, Inc. (Los Angeles Superior Court), a protracted class action litigation concerning violations of the Rees-Levering Automobile Sales Finance Act; the settlement resulted in full relief for the class.
 - Willoughby v. DT Credit Corp. (Los Angeles Superior Court), a class action brought to remedy violations of the post-repossession notice requirements of the Rees-Levering Act; settlement resulted in the lender waiving \$100 million in deficiency balances of class members.
 - O’Neal v. Ford Motor Credit Company (San Diego Superior Court), also a Rees-Levering post-repossession notice class action, which settled with over \$200 million in deficiency balance waiver benefits to class members, and several million dollars in restitution.
 - Pryer v. DaimlerChrysler Financial Services, LLC (Riverside Superior Court), which was another Rees-Levering post-repossession notice class action resulting in several hundred million dollars in deficiency balance waivers and restitution available for class members.
 - Bruno v. Capitol One (Los Angeles Superior Court). A Rees-Levering post-repossession notice class action which settlement resulted in \$189 million in deficiency balance waivers for class members, and \$2.1 million in restitution.
 - Gonzalez v. Fireside Bank (Los Angeles Superior Court). A Rees-Levering post-repossession class action which settlement resulted in \$298.6 million in deficiency balance waivers for class members.
 - Wimberly v. Triad Financial Corp. (Orange County Superior Court). Also a Rees-Levering post-repossession notice case, which involved plaintiff’s victories on contested class certification and summary judgment motions, and finally, a settlement which waived approximately \$161 million in deficiency balances on behalf of over 16,000 class members.
 - Baker v. GE Finance. (U.S. District Court, Northern District of California). This class action challenged GE Finance’s post-repossession notices in California.

1 The settlement resulted in over \$44 million in debt relief to the class, plus
2 restitution.

- 3 • Clark v. Par, Inc. (U.S. District Court, Central District of California). This class
4 action was brought against the largest auto repossession company in the United
5 States, Par, Inc., alleging its failure to obtain appropriate repossession licenses.
6 The case broke new ground in establishing that so-called “repossession
7 forwarders” are subject to the Fair Debt Collection Practices Act.
- 8 • Sanai v. Saltz, 170 Cal.App.4th 746 (2009). I drafted the appellate brief in this
9 landmark consumer case, on the issue of federal preemption. Prior to the
10 decision in Sanai v. Saltz, the courts had held for years that the federal Fair
11 Credit Reporting Act preempted California’s Consumer Credit Reporting
12 Agencies Act. The court of appeals ruled that no preemption existed, thus
13 leaving California consumers finally free to seek relief under the state act, which
14 is more consumer-friendly than the FCRA.

15 9. Through July 10, 2019, the Trueblood Law Firm has incurred approximately
16 \$161,700 in attorneys’ fees and \$11,612.12 in litigation costs. These costs include: (1) filing
17 and service fees; (2) copying and mailing expenses; and (3) computer research expenses. The
18 Trueblood Law Firm has not yet been compensated for these attorneys’ fees and costs.

19 I declare under penalty of perjury under the laws of the State of Washington and the
20 United States of America that the foregoing is true and correct.

21 EXECUTED this 20th day of September, 2019 at Los Angeles, California.

22 _____
23 Alexander B. Trueblood, WSBA #50612


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7 forwarders” are subject to the Fair Debt Collection Practices Act.
- 8 • Sanai v. Saltz, 170 Cal.App.4th 746 (2009). I drafted the appellate brief in this
9 landmark consumer case, on the issue of federal preemption of California’s
10 credit reporting law. Prior to the decision in Sanai v. Saltz, the courts had held for
11 years that the federal Fair Credit Reporting Act preempted California’s
12 Consumer Credit Reporting Agencies Act. The court of appeals ruled that no
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17 and service fees; (2) copying and mailing expenses; and (3) computer research expenses. The
18 Trueblood Law Firm has not yet been compensated for these attorneys’ fees and costs.

19 I declare under penalty of perjury under the laws of the State of Washington and the
20 United States of America that the foregoing is true and correct.

21 EXECUTED this 8th day of September, 2019 at Los Angeles, California.

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Alexander B. Trueblood, WSBA #50612