

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
COUNTY OF KING

DOUGLAS PROUDLOVE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SEED CONSULTING, LLC, doing business as,
SEED CAPITAL, CORP., ERIK GANTZ, KEVIN
TUSSY, and DOES 1-10,

Defendants.

NO. 20-2-09220-7 SEA

**DECLARATION OF SAM LEONARD IN
SUPPORT OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS AND SERVICE
AWARD**

I, Sam Leonard, declare as follows:

1. I am one of the attorneys of record for Plaintiffs in this action and the sole member of Leonard Law, PLLC. I make this declaration based on my personal knowledge.
2. Attached hereto as Exhibit 1 is a true and correct copy of my billing records reflecting the time I have spent working on this matter through September 26, 2022.
3. I work a total of 62.9 hours on the case. My billed time on this matter totals \$28,305 in attorney's fees. My billed time on this case does not reflect all of the hours that I have spent on this matter, but instead it represents those hours that I believed to be reasonably billed based on my experience.
4. Since starting my practice in November of 2015, I have helped over 200 individuals in individual consumer protection actions or debt defense actions. *See e.g. Pogrebinsky et al v. CACH, LLC*, Civ. No. 2:16-cv-01607-TSZ (W.D. Wash. 2016); *Weinkauf v.*

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- 1

CASE NO. 20-2-09220-7 SEA

1 *Veristone Mortg., LLC, et al*, Civ. No. 3:16-cv-05471-RBL (W.D. Wash. 2016); *In re: Stephen*
2 *Joseph Armstrong*, Civ. No. 16-10670-CMA (Bankr. W.D. Wash. 2016); *Columbia Recovery*
3 *Group, LLC v. Keva Dodd et al*, Case No. 16-2-23043-1 (King Co. Sup. Ct. 2016); *CACH, LLC v. Toby*
4 *Smith*, Case No. 15-2-20977-9 (King Co. Sup. Ct. 2015); *Columbia Credit Servs., Inc. v. Russell*
5 *Brandt*, 05-2-15410-1 (King Co. Sup. Ct. 2005); *Brandt v. Columbia Credit Servs.*, No. C17-
6 703RSM (W.D. Wash. 2017); *Columbia Recovery Group, LLC v. Tanya Martin et al*, 16-2-24338-0
7 (King Co. Sup. Ct. 2016); *Columbia Debt Recovery, LLC v. Jordan Pierce and Donte Gardiner*,
8 19CIV12217KCX (King Co. Dist. Ct. 2019); *Fairway Collections, LLC v. Michael Turner*, 21-2-
9 00097-14 (Grays Harbor Co. Sup. Ct. 2021).

10 5. I also have significant experience litigating consumer class actions. *See e.g. Dibb*
11 *et al v. AllianceOne Receivables Mgmt., Inc.*, No. 14-5835 RJB (W.D. Wash. 2014); *Bowen et al. v.*
12 *CSO et al.*, No. 2:17-cv-00677-JCC (W.D. Wash. 2017); *Esther Hoffman et al. v. Transworld*
13 *Systems, Inc. et al.*, No. 2:18 cv 1132-JCC (W.D. Wash. 2018); *David Zarza v. Midwest Recovery*
14 *Services, Inc. et al.*, Cs. No. 18-2-26378-6 (King Co. Sup. Ct. 2018); *Jammeh et. al. v. HNN*
15 *Associates, LLC, et al.*, Civ. No. 19-cv-00620-JLR (W.D. Wash. 2019); *Long et al. v. First Resolution*
16 *Investment Corp. et al.*, Cs. No. 19-2-11281-6 SEA (King Co. Sup. Ct. 2019); *Sanh v. Opportunity*
17 *Financial, LLC et al.*, Civ. No. 2:20-cv-00310-RSL (W.D. Wash. 2020); *David Buck et. al. v.*
18 *Northwest Commercial Real Estate Investments, LLC*, Cs. No. 21-2-03929-1 SEA (King Co. Sup. Ct.
19 2021); *Jennifer Demarre and Ryan Demarre v. Mutual of Enumclaw Insurance Co.*, Cs. No. 21-2-
20 10304-5 SEA (King Co. Sup. Ct. 2021). The class actions I have acted as counsel on have provided
21 relief to tens of thousands of Washingtonians and resulted in injunctive relief and class
22 members payments that are valued at over 24 million dollars. I have also argued before the
23 Ninth Circuit Court of Appeals, successfully reversing the trial court's dismissal of a consumer
24 collection abuse putative class action. *See Hoffman v. Transworld Sys.*, No. 19-35058, 2020 U.S.
25 App. LEXIS 8677 (9th Cir. Mar. 19, 2020).

1 6. My hourly rate is reasonable based on my extensive experience, skill, and
2 sophistication required for the types of legal services typically performed and the rates
3 customarily charged in the markets where my legal services are typically performed. I have
4 been approved at similar rates in other class actions.

5 7. Around ninety percent of my current practice focuses on debt collection abuse
6 and debt defense cases. Primarily, I provide low-bono and contingent fee structures to my
7 clients who often cannot afford the current market rate for legal services. I am one of only a
8 handful of practitioners, that I know of, whose legal practice focuses on debt collection abuse
9 and debt defense litigation in cases not primarily related to foreclosure.

10 8. I received a B.A. from Central Washington University in Ellensburg, Washington
11 in 2004. In 2013, I received my J.D. cum laude from Seattle University School of Law, where I
12 was President of the Public Interest Law Foundation, and a clinic student in the Korematsu
13 Center Civil Rights Amicus Clinic. In 2014, I wrote an opinion article, "The bankruptcy trap in
14 student-loan debt," which was published in The Seattle Times. I have also had published three
15 articles in the Washington State Association of Justice publication Trial News on litigating
16 consumer debt defense cases.

17 9. I am actively involved in professional organizations and nonprofits engaged in
18 consumer protection and debt collection abuse litigation. I am a member of the National
19 Association of Consumer Advocates and an Eagle member of the Washington State Association
20 for Justice. I am co-chair of the Washington Association of Justice's Consumer Protection
21 Section. I am the Board Chair Elect of the Northwest Consumer Law Center, an organization
22 which is primarily focused on providing pro-bono and low-bono legal services to low and
23 moderate-income Washington residents relating to debt. I am also a member of the Public
24 Justice Foundation and was named a Super Lawyers Rising Star.

25 10. I actively participate and attend CLEs, conferences, and social justice talks that
26 focus on consumer law issues. I was a guest lecturer at Seattle University School of Law's
27 Consumer Advocacy Clinic, where I spoke on Washington and federal debt collection law. In

1 2017, I was a presenter at a Washington State Association of Justice CLE, where I spoke on how
2 to run a successful consumer law practice. I have presented on the issue of debt collection
3 abuse twice during Social Justice Mondays held at Seattle University School of Law and taught a
4 Bankruptcy 101 class to students in Seattle University School of Law's Moderate Means
5 program. I attended the Consumer Rights Litigation Conference hosted by the National
6 Consumer Law Center in 2014, 2016, 2018, 2019 and 2022. I was also a presenter at the
7 Consumer Rights Litigation Conference held in 2022. I have attended over 60 hours of
8 continuing legal education classes on consumer and debt collection abuse litigation. I also
9 mentor other consumer attorneys and law students looking to become consumer attorneys and
10 regularly co-counsel with attorneys new to the practice of consumer law and debt defense.

11 11. Since 2008, I have volunteered at the King County Bar Association's
12 Neighborhood Legal Clinic that specializes in debt issues. For the last seven years, I have
13 volunteered in my capacity as a debt defense and bankruptcy attorney. I am also a volunteer
14 attorney for the Northwest Justice Project's debt clinic located in the King County Superior
15 Court Law Library.

16 I declare under penalty of perjury of the laws of the State of Washington that the
17 foregoing is true and correct, and that this declaration was executed in Kingston, Washington,
18 on this 17th day of November, 2022.

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20 By: /s/ Sam Leonard
21 Sam Leonard, WSBA #46498
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- Exhibit 1 -

Sam Leonard - Leonard Law, PLLC Hours

Date	Hours	Activity category	Rate (\$)	Billable (\$)
5/12/2020	1.9	Drafting Pleadings - Complaint	\$450.00	\$855.00
5/13/2020	0.6	Call with Co-Counsel	\$450.00	\$270.00
5/13/2020	0.2	Legal Research	\$450.00	\$90.00
5/14/2020	1.5	Drafting Pleadings - Complaint	\$450.00	\$675.00
5/15/2020	0.4	Drafting Pleadings - Complaint and Calls with Co-counsel	\$450.00	\$180.00
5/19/2020	0.8	Factual Research	\$450.00	\$360.00
5/20/2020	2.2	Drafting Pleadings - Complaint	\$450.00	\$990.00
5/20/2020	1.1	Legal Research	\$450.00	\$495.00
5/20/2020	0.3	Call with Co-Counsel	\$450.00	\$135.00
5/21/2020	0.2	Call with Co-Counsel	\$450.00	\$90.00
5/21/2020	0.4	Reviewing Credit Card Agreements	\$450.00	\$180.00
7/7/2020	2.1	Drafting Discovery	\$450.00	\$945.00
7/8/2020	1.3	Legal Research	\$450.00	\$585.00
7/21/2020	0.3	Reviewing discovery responses	\$450.00	\$135.00
7/28/2020	1.1	Reviewing discovery responses	\$450.00	\$495.00
7/28/2020	0.3	Drafting Email	\$450.00	\$135.00
7/29/2020	0.2	Drafting Correspondence to Co Counsel	\$450.00	\$90.00
7/29/2020	0.3	Drafting Correspondence to Co Counsel	\$450.00	\$135.00
8/3/2020	0.2	Drafting/Reviewing Correspondence	\$450.00	\$90.00
8/10/2020	0.5	Reviewing discovery responses	\$450.00	\$225.00
8/10/2020	0.3	Drafting/Reviewing Correspondence	\$450.00	\$135.00
8/11/2020	0.5	Strategy Call with Co-Counsel	\$450.00	\$225.00
8/14/2020	1.1	Call with Opposing Counsel - Discovery Conference	\$450.00	\$495.00
8/14/2020	0.2	Call with Co-Counsel RE Discovery Conference	\$450.00	\$90.00
8/18/2020	0.5	Reviewing letter from opposing counsel regarding discovery conference and drafting email regarding analysis of assertions	\$450.00	\$225.00
8/19/2020	0.5	Factual Research - Online records review	\$450.00	\$225.00
8/20/2020	0.6	Reviewing RFA Response and Client Docs	\$450.00	\$270.00
8/24/2020	1.1	Editing MTD Response including cite checks and legal research	\$450.00	\$495.00
8/25/2020	0.2	Drafting Correspondence to Co Counsel RE Strategy	\$450.00	\$90.00
9/26/2020	1.2	Drafting Pleadings - Motion to Compel	\$450.00	\$540.00
10/5/2020	0.3	Drafting Pleadings - Response to Motion to Stay	\$450.00	\$135.00
10/12/2020	0.4	Drafting Settlement Agreement	\$450.00	\$180.00
1/12/2021	0.3	Call with Co-Counsel RE Strategy	\$450.00	\$135.00
2/5/2021	0.6	Drafting Pleadings - Notice of Disqualification	\$450.00	\$270.00
2/9/2021	0.3	Reviewing FTC complaint against SEED and PA Notes	\$450.00	\$135.00

2/17/2021	0.5 Call with Co-Counsel RE Strategy	\$450.00	\$225.00
2/17/2021	0.7 Factual Research - Online Videos	\$450.00	\$315.00
3/9/2021	0.5 Drafting Discovery	\$450.00	\$225.00
3/31/2021	0.1 Drafting/Reviewing Correspondence RE Strategy	\$450.00	\$45.00
4/6/2021	0.2 Drafting Correspondence to Co Counsel RE Strategy	\$450.00	\$90.00
4/19/2021	1.2 Drafting Pleadings - CR 37 Discovery Motion	\$450.00	\$540.00
6/15/2021	0.4 Factual Research and call with third party	\$450.00	\$180.00
6/15/2021	0.6 Drafting Correspondence to Third Party	\$450.00	\$270.00
6/16/2021	0.2 Drafting Correspondence to Co Counsel	\$450.00	\$90.00
6/16/2021	0.3 Drafting Discovery	\$450.00	\$135.00
6/30/2021	1 Call with Opposing Counsel - Discovery Conference	\$450.00	\$450.00
6/30/2021	0.3 Call with Co-Counsel RE Discovery Conference	\$450.00	\$135.00
7/1/2021	Drafting Correspondence to Opposing Party/Counsel	\$450.00	\$405.00
7/2/2021	Drafting Correspondence to Opposing Party/Counsel	\$450.00	\$270.00
8/26/2021	0.5 Call with Co-Counsel RE Discovery	\$450.00	\$225.00
9/23/2021	0.5 Drafting Pleadings - Class Cert and Declarations	\$450.00	\$225.00
10/20/2021	0.5 Call with Co-Counsel RE Strategy	\$450.00	\$225.00
10/22/2021	1 Call with Opposing Counsel - Discovery Conference	\$450.00	\$450.00
11/1/2021	0.2 Drafting/Reviewing Correspondence to Third Party	\$450.00	\$90.00
1/7/2022	0.5 Hearing - Gantz Tussy MSJ	\$450.00	\$225.00
1/7/2022	0.8 Hearing - Prep	\$450.00	\$360.00
3/11/2022	0.6 Call with Co-Counsel RE Trial Prep	\$450.00	\$270.00
6/16/2022	0.2 Reviewing case schedule and witness disclosures	\$450.00	\$90.00
6/29/2022	1.5 Trial Preparation	\$450.00	\$675.00
7/12/2022	2.6 Trial Preparation	\$450.00	\$1,170.00
7/14/2022	2.1 Drafting Pleadings	\$450.00	\$945.00
7/14/2022	0.2 Call with Co-Counsel RE Jury Instructions	\$450.00	\$90.00
7/21/2022	0.4 In Person Client Meeting	\$450.00	\$180.00
7/25/2022	0.5 Call with Co-Counsel RE Trial and Deposition Prep	\$450.00	\$225.00
8/3/2022	0.5 Drafting Pleadings - Motion to Clarify MSJ	\$450.00	\$225.00
8/10/2022	0.9 Legal Research	\$450.00	\$405.00
9/9/2022	1.1 Call with Co-Counsel RE Trial Prep	\$450.00	\$495.00
9/9/2022	0.3 Trial preparation call with BT	\$450.00	\$135.00
9/9/2022	0.8 Call with Opposing Counsel - Discovery Conference	\$450.00	\$360.00

9/12/2022	1	Reviewing and researching summary exhibit	\$450.00	\$450.00
9/12/2022	0.8	Call with Third Party	\$450.00	\$360.00
9/16/2022	0.8	Call with Opposing Counsel RE Trial Readiness	\$450.00	\$360.00
9/19/2022	0.2	Drafting Email RE Discovery	\$450.00	\$90.00
		Emails regarding settlement demands and records		
9/19/2022	0.3	produced.	\$450.00	\$135.00
9/22/2022	0.3	Call with Co-Counsel RE Discovery	\$450.00	\$135.00
9/24/2022	1.9	Legal Research	\$450.00	\$855.00
9/27/2022	1	Call with co-counsel RE strategy and settlement	\$450.00	\$450.00
9/28/2022	0.5	Call with Co-Counsel RE Settlement	\$450.00	\$225.00
9/28/2022	1.1	Settlement Agreement Review and Legal Research	\$450.00	\$495.00
6/12/2020	0.5	Reviewing/Editing Discovery to Seed	\$450.00	\$225.00
6/12/2020	0.2	Emailing with co-counsel RE discovery	\$450.00	\$90.00
7/1/2020	0.2	Emailing w/ co-counsel RE Subpoena	\$450.00	\$90.00
7/6/2020	0.2	Emails regarding discovery strategy	\$450.00	\$90.00
		Editing RFAs and emailing with co-counsel		
7/8/2020	0.5	regarding strategy	\$450.00	\$225.00
		Correspondence with co-counsel RE RFAs and		
7/14/2020	0.5	discovery strategy	\$450.00	\$225.00
7/16/2020	0.3	Emailing with co-counsel RE strategy and status	\$450.00	\$135.00
		Drafting reviewing and communicating with co-		
9/16/2020	0.3	counsel regarding discovery letter	\$450.00	\$135.00
10/12/2020	0.2	Emailing analysis of settlement agreement	\$450.00	\$90.00
10/13/2020	0.3	Reviewing Court Order	\$450.00	\$135.00
		Reviewing settlement agreement and		
10/13/2020	0.3	corresponding with co-counsel.	\$450.00	\$135.00
		Drafting/Reviewing Correspondence RE Records		
10/22/2020	0.4	Review	\$450.00	\$180.00
		Online research and drafting email regarding		
11/10/2020	0.3	findings	\$450.00	\$135.00
1/27/2021	0.3	Drafting reviewing correspondence RE strategy	\$450.00	\$135.00
		Call with opposing counsel, factual research and		
2/3/2021	0.5	emails with co-counsel	\$450.00	\$225.00
2/12/2021	0.2	Drafting reviewing correspondence RE strategy	\$450.00	\$90.00
4/26/2021	0.3	Editing pleadings	\$450.00	\$135.00
6/30/2021	0.2	Online research RE KT	\$450.00	\$90.00
12/10/2021	1	Reviewing Def. MSJ and emails RE same	\$450.00	\$450.00
		Drafting and Reviewing Correspondence RE: Seed		
2/23/2022	0.3	Mediation Submission	\$450.00	\$135.00
		Drafting reviewing correspondence to opposing		
4/8/2022	0.2	counsel	\$450.00	\$90.00
9/7/2022	0.2	Reviewing correspondence	\$450.00	\$90.00

	Drafting/Editing proposed finding of fact and		
9/26/2022	0.4 conclusions of law	\$450.00	\$180.00
Total	62.9		\$28,305.00