

HON. SALVADOR MENDOZA JR.

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7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON

9 VALERIE RHODES, a single woman,
10 and on behalf of others similarly situated,

11 Plaintiff,

12 vs.

13 WELLS FARGO BANK, NATIONAL
14 ASSOCIATION, A National Banking
15 Association

16 Defendant.

NO. 2:17-CV-0093-SMJ

DECLARATION OF DALE FOREMAN
REGARDING LOCAL RATES FOR
ATTORNEY SERVICES

CLASS ACTION

17 DALE FOREMAN, pursuant to 28 U.S.C. § 1746, declares:

18 1. I am a partner at the law firm of Foreman, Appel, Hotchkiss, Zimmerman &
19 Bauscher, PLLC ("FAHZ") in Wenatchee, Washington. I am over 18 years of age, make
20 this declaration based upon my own personal knowledge, and I am competent to testify to
the matters asserted herein.

2. I was educated at Harvard College and obtained my J.D. from Harvard Law

1 School. Since 1975, I have represented family businesses, corporations, public utility
2 districts, farmers, orchardists and individuals in every area of civil litigation. I am the
3 author of several books, including the Washington Trial Handbook.

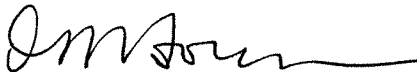
4 3. I am currently admitted to practice in Washington, state and federal courts. I
5 was also a member of the State Bar of California from 1986 until 2016 when I retired. I
6 am a member of the 9th Circuit and the 3rd Circuit U.S. Court of Appeals.

7 4. I have extensive experience in class actions, collective actions, and other
8 complex matters from 1982 through current. I have been actively involved in every
9 aspect of multiple class actions brought on behalf of consumers, employees, and others.

10 5. My current hourly rate for legal services is \$400. I believe this is a
11 reasonable rate for partner-level attorneys practicing in the North Central Washington
12 region.

13 I declare under penalty of perjury under the laws of the state of Washington that
14 the foregoing is true and correct.

15 DATED this 19th ^{September} day of 9/19/2018.

16 

17 _____
DALE FOREMAN

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of October, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System. Notice of this filing will be sent to the parties listed below by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

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DATED at Wenatchee, Washington this 1st day of October, 2018.

s/CLAY M. GATENS
Clay M. Gatens, WSBA No. 34102
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