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11 Attorneys for Plaintiffs
12 BARBARA WALDRUP, BECKIE
13 REASTER, REBECCA MURPHY
individually, and on behalf of those
similarly situated

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15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION**

17 BARBARA WALDRUP, individually,
18 and on behalf of other members of the
19 general public similarly situated,

20 Plaintiff,

21 vs.

22 COUNTRYWIDE FINANCIAL
23 CORPORATION, a Delaware
24 corporation, et al.,

25 Defendants.

Case Number: 2:13-cv-08833-
CAS(AGR_x)
CLASS ACTION

**DECLARATION OF BARBARA
WALDRUP IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES,
LITIGATION COSTS, AND CLASS
REPRESENTATIVE SERVICE
AWARDS**

District Judge: Hon. Christina A. Snyder

Hearing Date: July 13, 2020
Time: 10:00 a.m.

1 ELIZABETH WILLIAMS, BECKIE
2 REASTER, REBECCA MURPHY,
3 individually, and on behalf of all others
similarly situated,

4 Plaintiffs,

5 vs.

6 COUNTRYWIDE FINANCIAL
7 CORPORATION, a Delaware
corporation, et al.

8 Defendants.

Consolidated with
Case Number: 2:16-cv-4166 CAS(AGR_x)

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DECLARATION OF BARBARA WALDRUP

I, Barbara Waldrup, declare as follows:

1. I am a resident of Houston, Texas. I am one of the Plaintiffs in the above-described lawsuit and was appointed by the Court as a Class Representative. I submit this Declaration in support of Plaintiffs’ Motion for an Award of Attorneys’ Fees, Litigation Costs and Class Representative Service Awards. If called upon to testify concerning the facts set forth in this declaration, I could and would testify about them because the facts in this declaration are personally known to me to be true.

2. I assisted Class Counsel with the investigation of this matter, including providing details about my loan with Countrywide and the appraisal I obtained in connection with that loan.

3. I have been integrally involved and attentive to this litigation. I worked with Class Counsel in drafting the complaint by providing facts and documentation to support the allegations. I am familiar with the nature of this lawsuit and the allegations of my complaint, including its facts and legal theories.

I. Summary of My Work on Behalf of the Class

a. Responding to Written Discovery

4. Since I filed my complaint in 2013, I have regularly communicated with my lawyers concerning the litigation, and I continue to do so. Additionally, I participated, and continue to participate, in the case by providing documents and other information requested by my counsel.

5. As part of my participation, I have responded to numerous rounds of written discovery which has been itemized below:

Defendant	Pre-certification requests
Bank of America, Corporation	Special Interrogatories, Set One
Bank of America, Corporation	Special Interrogatories, Set Two
Bank of America, Corporation	Special Interrogatories, Set Three
Bank of America, Corporation	Requests for Production, Set One

1	Bank of America, N.A.	Special Interrogatories, Set One
2	Bank of America, N.A.	Special Interrogatories, Set Two
3	Bank of America, N.A.	Requests for Production, Set One
4	Bank of America, N.A.	Requests for Admission, Set One
5	Countrywide Financial Corporation	Special Interrogatories, Set One
6	Countrywide Financial Corporation	Special Interrogatories, Set Two
7	Countrywide Financial Corporation	Requests for Production, Set One
8	Countrywide Home Loans, Inc.	Special Interrogatories, Set One
9	Countrywide Home Loans, Inc.	Special Interrogatories, Set Two
10	Countrywide Home Loans, Inc.	Requests for Production, Set One
11	Countrywide Home Loans, Inc.	Requests for Admission, Set One
12	Landsafe Appraisal Services, Inc.	Special Interrogatories, Set One
13	Landsafe Appraisal Services, Inc.	Special Interrogatories, Set Two
14	Landsafe Appraisal Services, Inc.	Requests for Production, Set One
15	Landsafe Appraisal Services, Inc.	Requests for Production, Set Two
16	Landsafe Appraisal Services, Inc.	Requests for Production, Set Three
17	Landsafe Appraisal Services, Inc.	Requests for Production, Set Four
18	Landsafe Appraisal Services, Inc.	Requests for Admission, Set One
19	LandSafe Appraisal Services, Inc.	Requests for Admission, Set Two
20	Landsafe Inc.	Special Interrogatories, Set One
21	Landsafe Inc.	Special Interrogatories, Set Two
22	Landsafe Inc.	Requests for Production, Set One

6. To respond to this written discovery, I worked closely with Class Counsel to draft and verify all written responses to the Special Interrogatories, Requests for Production of Documents, and Request for Admissions. Specifically, I provided facts and information via numerous telephone calls and email exchanges to ensure that the information provided was accurate and correct to the best of my ability.

7. When necessary, I worked with Class Counsel to supplement my responses and provide additional facts if and when they became known.

8. I also provided hundreds of pages of documents in response to Defendants' Requests to Production in this matter. I searched my records multiple times at the request of Class Counsel to provide all relevant loan documents, email correspondence, and handwritten contemporaneous notes in my possession. To ensure all documents were provided, I had Class Counsel in my home to review what had been disclosed and ensure

1 that my production was complete.

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3 **b. Depositions**

4 9. On February 22, 2016, I had my deposition taken to provide facts in this
5 matter by counsel for Defendants, Mr. Douglas Thompson. I traveled to Los Angeles and
6 took several days off work to give deposition testimony. The deposition lasted a full day
7 and required several hours of preparation by Class Counsel the day before.

8 **II. POSITION REGARDING THE SETTLEMENT**

9 10. At all times throughout this litigation, I remained willing and able to travel
10 from Houston, Texas to Los Angeles, California to testify at trial.

11 11. In the summer of 2019, Class Counsel informed me that settlement
12 negotiations were ongoing in this matter.

13 12. In November 2019, Class Counsel informed me that a settlement in principle
14 had been reached. At the time, I was in favor of the terms of the tentative settlement.

15 13. In January 2020, Class Counsel provided me with a copy of the Settlement
16 Agreement for my review and signature. I reviewed its terms carefully. I was encouraged
17 by Class Counsel to ask questions regarding anything in the Settlement Agreement and I
18 did, in fact, ask questions to make sure I understood what I was signing.

19 14. I lent my name to the case so I could help the millions of people who, like
20 me, were adversely affected by the Defendants' alleged conduct.


21 15. I do not have interests that conflict with those of the other class members. I
22 understand that because this is a class action case and I represent a class of other people
23 who were injured by Defendants' alleged conduct. I have a duty to consider their interests
24 and put them about my own.

25 16. On January 31, 2020, I executed the Settlement Agreement only after I had
26 concluded that the Settlement Agreement was in fair, reasonable, and in the best interests
27 of the class.

28 17. In sum, I have spent considerable time and attention working on this case,

1 always in the best interests of the class in mind. I understand that my attorneys took this
2 case on a contingency fee basis, and neither they nor I have received any compensation
3 from anyone for the work devoted to this matter.

4 I declare under penalty of perjury under the laws of the United States that the
5 foregoing is true and correct. Executed this 6 day of May 2020 in Houston, Texas.

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8 BARBARA WALDRUP

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