

1 Daniel Alberstone (SBN 105275)
dalberstone@baronbudd.com
2 Roland Tellis (SBN 186269)
rtellis@baronbudd.com
3 Mark Pifko (SBN 228412)
mpifko@baronbudd.com
4 Evan Zucker (SBN 266702)
ezucker@baronbudd.com
5 BARON & BUDD, P.C.
6 15910 Ventura Boulevard, Suite 1600
Encino, California 91436
7 Telephone: (818) 839-2333
8 Facsimile: (818) 986-9698

Steve W. Berman (*pro hac vice*)
steve@hbsslaw.com
Hagens Berman Sobol Shapiro LLP
1918 Eighth Avenue, Suite 3300
Seattle, Washington 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594

Christopher R. Pitoun (SBN 290235)
christopherp@hbsslaw.com
Hagens Berman Sobol Shapiro LLP
301 North Lake Avenue, Suite 920
Pasadena, California 91101
Telephone: (213) 330-7150
Facsimile: (213) 330-7152

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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 BECKIE
REASTER 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.

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

Plaintiffs,

vs.

COUNTRYWIDE FINANCIAL CORPORATION, a Delaware corporation, et al.

Defendants.

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

DECLARATION OF BECKIE REASTER

I, Beckie Reaster, declare as follows:

1. I am a resident of New Smyrna Beach, Florida. 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 2016, 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	Requests for Production, Set One
Bank of America, N.A.	Special Interrogatories, Set One

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

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

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

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

1 **b. Depositions**

2 9. On August 31, 2017, I had my deposition taken to provide facts in this matter
3 by counsel for Defendants, Mr. Douglas Thompson. I took a day off work to give
4 deposition testimony. The deposition lasted a full day and required several hours of
5 preparation by Class Counsel the day before.

6 10. In addition, even though he was barely involved in applying for our loan, my
7 husband, Mr. Joseph Reaster, was deposed in this matter. He was also prepared by Class
8 Counsel and his deposition session lasted a half a work day.

9 **II. POSITION REGARDING THE SETTLEMENT**

10 11. At all times throughout this litigation, I remained willing and able to travel
11 from New Smyrna, Florida to Los Angeles, California to testify at trial.

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

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

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

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

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

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

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

5 I declare under penalty of perjury under the laws of the United States that the
6 foregoing is true and correct. Executed this __ day of May 2020 in New Smyrna Beach,
7 Florida.

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9 BECKIE REASTER

10 May 5, 2020
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