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THE HONORABLE ANDREA DARVAS
Department 23
Noted for Hearing: May 5, 2023, at 9:00 a.m.
With Oral Argument

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

JENIFER K. DEMARRE & RYAN A. DEMARRE,

Plaintiffs,

vs.

MUTUAL OF ENUMCLAW INSURANCE
COMPANY,

Defendant.

NO. 21-2-10304-5 SEA

**DECLARATION OF SAM LEONARD IN
SUPPORT OF PLAINTIFFS’ MOTION FOR
ATTORNEYS’ FEES, COSTS, AND SERVICE
AWARDS**

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 October 13, 2022.
- 3. 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.*

1 *Pogrebinsky et al v. CACH, LLC*, Civ. No. 2:16-cv-01607-TSZ (W.D. Wash. 2016); *Weinkauf v.*
2 *Veristone Mortg., LLC, et al*, Civ. No. 3:16-cv-05471-RBL (W.D. Wash. 2016); *In re: Stephen*
3 *Joseph Armstrong*, Civ. No. 16-10670-CMA (Bankr. W.D. Wash. 2016); *Columbia Recovery*
4 *Group, LLC v. Keva Dodd et al*, Case No. 16-2-23043-1 (King Co. Sup. Ct. 2016); *CACH, LLC v. Toby*
5 *Smith*, Case No. 15-2-20977-9 (King Co. Sup. Ct. 2015); *Columbia Credit Servs., Inc. v. Russell*
6 *Brandt*, 05-2-15410-1 (King Co. Sup. Ct. 2005); *Brandt v. Columbia Credit Servs.*, No. C17-
7 703RSM (W.D. Wash. 2017); *Columbia Recovery Group, LLC v. Tanya Martin et al*, 16-2-24338-0
8 (King Co. Sup. Ct. 2016); *Columbia Debt Recovery, LLC v. Jordan Pierce and Donte Gardiner*,
9 19CIV12217KCX (King Co. Dist. Ct. 2019); *Fairway Collections, LLC v. Michael Turner*, 21-2-
10 00097-14 (Grays Harbor Co. Sup. Ct. 2021).

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

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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 80 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.

15 I declare under penalty of perjury of the laws of the State of Washington that the
16 foregoing is true and correct, and that this declaration was executed in Seattle, Washington, on
17 this 20th day of January, 2023.

18 By: /s/ Sam Leonard
19 Sam Leonard, WSBA #46498

Exhibit 1

LEONARD LAW, PLLC HOURS

Date	Hours	Description	Rate	Billable
1/31/2020	0.2	Call w/ Ryan Demarre RE: Auto Issue	\$495.00	\$99.00
1/31/2020	0.8	Reviewing Client Documents	\$495.00	\$396.00
2/7/2020	0.8	Phone consult	\$495.00	\$396.00
2/10/2020	1.2	In Person Client Meeting	\$495.00	\$594.00
2/10/2020	0.2	Reviewing Client Documents	\$495.00	\$99.00
2/10/2020	0.2	Emailing with client RE Client records	\$495.00	\$99.00
2/11/2020	0.3	Reviewing Client Documents - Insurance	\$495.00	\$148.50
2/24/2020	0.2	Emailing with client	\$495.00	\$99.00
2/24/2020	0.2	Drafting Correspondence to Co Counsel	\$495.00	\$99.00
3/13/2020	0.2	Emailing with client	\$495.00	\$99.00
3/17/2020	0.2	Drafting Correspondence to Opposing Party/Counsel	\$495.00	\$99.00
3/20/2020	0.2	Drafting Correspondence to Opposing Party/Counsel	\$495.00	\$99.00
3/20/2020	0.3	Reviewing letter from opposing party and emails with co-counsel RE Subrogation	\$495.00	\$148.50
3/23/2020	0.7	Reviewing Client Documents	\$495.00	\$346.50
3/23/2020	0.2	Drafting Email RE claims and client facts	\$495.00	\$99.00
3/23/2020	0.2	Email with Third Party	\$495.00	\$99.00
3/23/2020	0.3	Drafting Correspondence to Opposing Party/Counsel	\$495.00	\$148.50
3/24/2020	0.7	Drafting/Reviewing Correspondence	\$495.00	\$346.50
3/26/2020	0.2	Call with Client	\$495.00	\$99.00
3/26/2020	0.2	Emailing with client RE Status	\$495.00	\$99.00
3/26/2020	0.3	Emailing with client RE Settlement Offers	\$495.00	\$148.50
3/27/2020	0.4	Drafting Correspondence to Opposing Party/Counsel	\$495.00	\$198.00
4/2/2020	0.3	Drafting/Reviewing Correspondence from MOE	\$495.00	\$148.50
4/2/2020	0.2	Drafting Correspondence to Co Counsel RE Email from MOE	\$495.00	\$99.00
4/2/2020	0.3	Reviewing letter from opposing counsel and emailing with TM	\$495.00	\$148.50
4/4/2020	0.2	Emailing with client RE Vehicle Valuations	\$495.00	\$99.00
4/13/2020	0.2	Emailing with client RE Strategy	\$495.00	\$99.00
4/17/2020	0.2	Emailing with client	\$495.00	\$99.00
4/23/2020	0.3	Drafting Correspondence to Harber	\$495.00	\$148.50
4/23/2020	0.2	Drafting Correspondence to Third Party RE claims	\$495.00	\$99.00
4/23/2020	0.2	Reviewing Letter from Opposing Party/Counsel	\$495.00	\$99.00
4/24/2020	0.2	Drafting Correspondence to Harber	\$495.00	\$99.00
4/24/2020	0.5	Legal Research - claims and caselaw	\$495.00	\$247.50
4/29/2020	0.2	Email with Mike on Appraisal - RE: Professional Appraisal Needed	\$495.00	\$99.00
4/29/2020	0.2	Drafting Email RE Insurance Claim	\$495.00	\$99.00
5/4/2020	0.2	Call with Harber	\$495.00	\$99.00
5/4/2020	0.2	Drafting Correspondence to Opposing Party/Counsel	\$495.00	\$99.00
5/7/2020	0.2	Drafting Correspondence to Opposing Party/Counsel	\$495.00	\$99.00
5/11/2020	0.2	Emailing with MoE counsel regarding salvation value	\$495.00	\$99.00
5/11/2020	0.3	Email with Third Party	\$495.00	\$148.50
5/11/2020	0.1	Drafting Correspondence to Opposing Party/Counsel	\$495.00	\$49.50
5/12/2020	0.3	Legal Research	\$495.00	\$148.50
5/13/2020	0.3	Call to Co-Part	\$495.00	\$148.50
5/18/2020	0.1	Email with Harber RE appraisal	\$495.00	\$49.50
5/18/2020	0.5	Review Letter From Harber RE Appraisal	\$495.00	\$247.50
5/21/2020	0.2	Call with Client	\$495.00	\$99.00

5/21/2020	0.2	Call with Harber	\$495.00	\$99.00
5/21/2020	0.1	Emailing with client RE appraisal	\$495.00	\$49.50
5/22/2020	0.2	Emailing with client RE Next Steps	\$495.00	\$99.00
5/22/2020	0.2	Email with Harber	\$495.00	\$99.00
5/22/2020	0.4	Call with Mike Harber and client RE appraisal	\$495.00	\$198.00
5/28/2020	0.3	Call with CCO Appraisal Dispute	\$495.00	\$148.50
5/29/2020	0.2	Emailing with client RE appraisal	\$495.00	\$99.00
6/1/2020	0.2	Emailing with client RE appraisal	\$495.00	\$99.00
6/2/2020	0.2	Email with Harber RE appraisal	\$495.00	\$99.00
6/3/2020	0.2	Emailing with client RE Salvage deduction	\$495.00	\$99.00
6/3/2020	0.2	Emailing with client RE Salvage deduction	\$495.00	\$99.00
6/8/2020	0.5	Call with Harber	\$495.00	\$247.50
6/8/2020	0.2	Email with Third Party	\$495.00	\$99.00
6/10/2020	0.6	Legal Research - case law and similar cases	\$495.00	\$297.00
6/19/2020	0.2	Email with Harber - RE: Demarre v Mutual of Enumclaw	\$495.00	\$99.00
6/22/2020	0.2	Email with Harber - RE: Demarre v Mutual of Enumclaw	\$495.00	\$99.00
6/24/2020	0.2	Email with Harber - FW: Jenifer Demarre and Ryan Demarre	\$495.00	\$99.00
6/25/2020	0.7	Call with Harber	\$495.00	\$346.50
6/25/2020	0.2	Reviewing Harbor Invoice and Work	\$495.00	\$99.00
6/30/2020	0.3	Emails with Harber - RE: Jenifer Demarre and Ryan Demarre	\$495.00	\$148.50
7/1/2020	0.8	Reviewing Harbor communications with Insurance Appraiser	\$495.00	\$396.00
7/2/2020	0.4	Call with Co-Counsel RE Next Statement and Legal research	\$495.00	\$198.00
7/2/2020	0.2	Email with opposing counsel RE: Jenifer Demarre and Ryan Demarre	\$495.00	\$99.00
7/2/2020	0.6	Legal Research - similar cases	\$495.00	\$297.00
7/6/2020	0.3	Drafting Correspondence to Opposing Party/Counsel	\$495.00	\$148.50
7/6/2020	0.2	Emailing with client	\$495.00	\$99.00
7/7/2020	0.3	Emailing with client RE Title and Lien Release	\$495.00	\$148.50
7/14/2020	0.2	Drafting Correspondence to Opposing Party/Counsel	\$495.00	\$99.00
7/17/2020	0.2	Email with MH - RE: Jennifer Demarre	\$495.00	\$99.00
7/21/2020	0.3	Emailing with client RE: Status and Next Steps	\$495.00	\$148.50
7/21/2020	0.2	MOE Letters to Client	\$495.00	\$99.00
7/29/2020	0.2	Email with Harber RE payment RE: Jennifer Demarre	\$495.00	\$99.00
8/1/2020	0.2	Emailing with Harber Appraiser	\$495.00	\$99.00
8/14/2020	0.2	Emails with opposing party RE Subrogation	\$495.00	\$99.00
8/18/2020	0.2	Emailing with client RE: Status and Next Steps	\$495.00	\$99.00
9/10/2020	0.3	Emailing with client	\$495.00	\$148.50
10/28/2020	0.2	Emailing with client RE Class Action	\$495.00	\$99.00
11/23/2020	0.2	Reviewing file and sending docs to co-counsel	\$495.00	\$99.00
12/23/2020	0.2	Emails with co-counsel RE complaint	\$495.00	\$99.00
12/28/2020	0.3	Call with Co-Counsel RE client facts and complaint	\$495.00	\$148.50
1/28/2021	0.3	Emailing with client RE: Truck Title	\$495.00	\$148.50
2/1/2021	0.1	Emailing with co-counsel RE: Complaint	\$495.00	\$49.50
2/9/2021	0.8	Drafting Class Complaint	\$495.00	\$396.00
2/10/2021	1.6	Drafting complaint.	\$495.00	\$792.00
2/11/2021	4.5	Editing and drafting complaint	\$495.00	\$2,227.50
2/11/2021	0.2	Emailing with client RE Complaint	\$495.00	\$99.00
2/12/2021	0.7	Call with co-counsel on Class Complaint	\$495.00	\$346.50
2/22/2021	1.4	Drafting Complaint	\$495.00	\$693.00
2/22/2021	0.1	Emailing with co-counsel RE Complaint	\$495.00	\$49.50
2/26/2021	0.2	Emailing with client RE Complaint	\$495.00	\$99.00

2/26/2021	0.3	Reviewing Complaint prior to sending to client	\$495.00	\$148.50
3/9/2021	0.2	Reviewing NOA & Research	\$495.00	\$99.00
3/23/2021	0.1	Review draft affidavit of service	\$495.00	\$49.50
3/24/2021	0.3	Call with Opposing Counsel - Meet and Greet and Case Management	\$495.00	\$148.50
4/27/2021	0.5	Call with Co-Counsel RE Strategy and Status	\$495.00	\$247.50
4/27/2021	0.5	Reviewing Opposing Party Pleadings - Answer	\$495.00	\$247.50
4/30/2021	0.2	Emails with co-counsel	\$495.00	\$99.00
5/4/2021	0.2	Drafting/Reviewing Correspondence	\$495.00	\$99.00
5/5/2021	0.4	Teams meeting with opposing counsel regarding discovery.	\$495.00	\$198.00
5/5/2021	0.3	Debrief on call with opposing counsel and strategy meeting.	\$495.00	\$148.50
5/20/2021	0.2	Correspondence RE: [External] Demarre v. MOE	\$495.00	\$99.00
5/24/2021	0.2	Reviewing Amended Complaint	\$495.00	\$99.00
6/9/2021	0.2	Reviewing emails with opposing counsel	\$495.00	\$99.00
6/30/2021	1	Reviewing MOE discovery responses	\$495.00	\$495.00
8/10/2021	0.2	Drafting Correspondence to Co Counsel	\$495.00	\$99.00
8/27/2021	0.5	Emails with co-counsel RE Case strategy	\$495.00	\$247.50
8/31/2021	0.9	Call with Co-Counsel RE Discovery and Complaint	\$495.00	\$445.50
9/29/2021	1	Drafting Correspondence to Co Counsel RE Litigation strategy and rationale	\$495.00	\$495.00
9/30/2021	0.6	Call with Co-Counsel RE Strategy	\$495.00	\$297.00
10/15/2021	0.3	Drafting Correspondence to Opposing Party/Counsel RE Settlement	\$495.00	\$148.50
10/15/2021	0.5	Researching salvage market	\$495.00	\$247.50
12/21/2021	0.6	Call with Opposing Counsel	\$495.00	\$297.00
12/21/2021	0.4	Call with Co-Counsel RE Strategy	\$495.00	\$198.00
12/21/2021	1.1	Legal Research	\$495.00	\$544.50
12/21/2021	0.4	Drafting letter to counsel RE Audatex research	\$495.00	\$198.00
3/7/2022	0.3	Reviewing witness disclosures and case file.	\$495.00	\$148.50
3/9/2022	0.5	Reviewing discovery responses from MOE regarding class data and emailing co-counsel findings	\$495.00	\$247.50
3/9/2022	0.3	Drafting Correspondence to Co Counsel RE Total Loss Class	\$495.00	\$148.50
3/30/2022	1.2	Editing Mediation Submission	\$495.00	\$594.00
3/30/2022	0.2	Emailing with client RE Case Status	\$495.00	\$99.00
3/31/2022	0.5	Calls and Emails w/ Co-counsel RE: Mediation and Cert	\$495.00	\$247.50
4/5/2022	10.2	Mediation	\$495.00	\$5,049.00
4/8/2022	0.4	Call with Audadex Counsel RE subpoena	\$495.00	\$198.00
4/8/2022	0.3	Call with Co-Counsel RE Audadex	\$495.00	\$148.50
4/29/2022	0.5	Reviewing discovery responses	\$495.00	\$247.50
5/24/2022	0.5	Call with Co-Part regarding Subpoena	\$495.00	\$247.50
5/26/2022	2.8	Reviewing documents from audatex and drafting memo to co counsel regarding next steps	\$495.00	\$1,386.00
6/6/2022	0.8	Reviewing new case regarding claims and drafting memo regarding impact to our case.	\$495.00	\$396.00
6/7/2022	0.5	Call with co-counsel and Co-Part	\$495.00	\$247.50
6/8/2022	0.6	Strategy meeting	\$495.00	\$297.00
6/15/2022	0.2	Emailing with client RE depositions	\$495.00	\$99.00
6/16/2022	0.3	Call with Client RE: Deposition and Status	\$495.00	\$148.50
6/17/2022	0.5	Call with Co-Counsel RE 30(b)(6) Prep	\$495.00	\$247.50
6/17/2022	0.5	Call with Opposing Counsel RE 30(b)(6)	\$495.00	\$247.50
6/17/2022	0.3	Call with Copart	\$495.00	\$148.50

6/17/2022	0.2	Emailing with co-counsel and opposing counsel	\$495.00	\$99.00
7/11/2022	0.8	Call with Co-Counsel RE Deposition strategy	\$495.00	\$396.00
7/11/2022	0.2	Emailing with client RE Depositions	\$495.00	\$99.00
7/14/2022	1	Call with Client RE Deposition Prep	\$495.00	\$495.00
7/14/2022	0.5	Emailing with client RE Deposition prep	\$495.00	\$247.50
7/15/2022	4	Deposition of Clients	\$495.00	\$1,980.00
7/15/2022	0.7	Deposition Client conferences	\$495.00	\$346.50
7/15/2022	0.2	Drafting Correspondence to Co Counsel RE Deposition	\$495.00	\$99.00
8/5/2022	0.5	Drafting/Reviewing Correspondence RE Settlement	\$495.00	\$247.50
8/17/2022	0.7	Call with Client RE Discovery	\$495.00	\$346.50
8/17/2022	0.5	Reviewing files client emailed	\$495.00	\$247.50
9/1/2022	1.2	Drafting Discovery Responses	\$495.00	\$594.00
9/2/2022	0.5	Drafting discovery responses	\$495.00	\$247.50
9/5/2022	2.1	Working on Discovery Responses	\$495.00	\$1,039.50
9/6/2022	0.5	Call with Co-Counsel - ER 408	\$495.00	\$247.50
9/15/2022	5.1	Drafting Pleadings - Motion for Cert	\$495.00	\$2,524.50
9/16/2022	0.3	Drafting Pleadings - Decl. ISO Cert	\$495.00	\$148.50
9/19/2022	0.3	Factual Research - Salvage Valuations	\$495.00	\$148.50
10/6/2022	0.5	Call with Co-Counsel - ER 408	\$495.00	\$247.50
10/11/2022	0.3	Call with Client - Settlement	\$495.00	\$148.50
10/12/2022	0.2	Call with Client - Settlement	\$495.00	\$99.00
10/13/2022	0.3	Reviewing Settlement	\$495.00	\$148.50
11/4/2022	0.2	Drafting Pleadings - Decl. ISO Prelim Approval	\$495.00	\$99.00
11/4/2022	0.2	Emailing with client RE Motion for Prelim Approval	\$495.00	\$99.00
TOTAL	88.4			\$43,758.00