

THE HONORABLE ANDREA DARVAS
Department 23
Noted for Consideration: November 14, 2022
Without 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 SAMUEL R. LEONARD
IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL**

I, Samuel R. Leonard, declare as follows:

1. I am one of the attorneys of record for Plaintiffs in this action and the sole attorney at Leonard Law, PLLC. I make this declaration based on my personal knowledge.

2. Since starting my practice in November of 2015, I have helped over 200 individuals in individual consumer protection actions. *See e.g. Pogrebinsky et al v. CACH, LLC*, Civ. No. 2:16-cv-01607-TSZ (W.D. Wash. 2016); *Weinkauf v. Veristone Mortg., LLC, et al*, Civ. No. 3:16-cv-05471-RBL (W.D. Wash. 2016); *In re: Stephen Joseph Armstrong*, Civ. No. 16-10670-CMA (Bankr. W.D. Wash. 2016); *Columbia Recovery Group, LLC v. Keva Dodd et al*, Case No. 16-2-23043-1 (King Co. Sup. Ct. 2016); *CACH, LLC v. Toby Smith*, Case No. 15-2-20977-9 (King Co. Sup. Ct. 2015); *Columbia Credit Servs., Inc. v. Russell Brandt*, 05-2-15410-1 (King Co. Sup. Ct.

1 2005); *Brandt v. Columbia Credit Servs.*, No. C17-703RSM (W.D. Wash. 2017); *Columbia*
2 *Recovery Group, LLC v. Tanya Martin et al*, 16-2-24338-0 (King Co. Sup. Ct. 2016).

3 3. I also have significant experience litigating consumer class actions. *See e.g. Dibb*
4 *et al v. Alliance One Receivables Mgmt., Inc.*, No. 14-5835 RJB (W.D. Wash. 2014); *Bowen et al.*
5 *v. CSO et al.*, No. 2:17-cv-00677-JCC (W.D. Wash. 2017); *Esther Hoffman et al. v. Transworld*
6 *Systems, Inc. et al.*, No. 2:18 cv 1132-JCC (W.D. Wash. 2018); *David Zarza v. Midwest Recovery*
7 *Services, Inc. et al.*, Case No. 18-2-26378-6 (King Co. Sup. Ct. 2018); *Monty Long et. al. v. First*
8 *Resolution Investment Corporation, et al*, Case No. 19-2-11281-6 SEA (King Co. Sup. Ct. 2019);
9 *Buck et al. v. Northwest Commercial Real Estate Investments, LLC*, Case No. 21-2-03929-1 SEA
10 (King Co. Sup. Ct. 2021), and *Sanh v. Opportunity Financial, LLC et al.*, Civ. No. 2:20-cv-00310-
11 RSL (W.D. Wash. 2020). I have also argued before the Ninth Circuit Court of Appeals,
12 successfully reversing the trial court’s dismissal of the Hoffman class action *See Hoffman v.*
13 *Transworld Sys.*, No. 19-35058, 2020 U.S. App. LEXIS 8677 (9th Cir. Mar. 19, 2020). Among those
14 class actions I have litigated, numerous have resulted in agreed settlements. *See Dibb, Bowen,*
15 *Zarza, Long.* The class settlements in the *Dibb* and *Bowen* matter combined resulted in
16 settlement funds totaling over \$2 million and provide relief from illegal collection to tens of
17 thousands of Washingtonians. The Long matter resulted in the forgiveness of over \$20 million
18 dollars in what plaintiffs alleged to be unlawfully obtained judgments.

19 4. I received a B.A. from Central Washington University in Ellensburg, Washington
20 in 2004. In 2013, I received my J.D. cum laude from Seattle University School of Law, where I
21 was President of the Public Interest Law Foundation and worked as a student in the Korematsu
22 Center Civil Rights Amicus Clinic. In 2014, I wrote an opinion article, “The bankruptcy trap in
23 student-loan debt,” which was published in The Seattle Times. I have also had published two
24 articles in the Washington State Association of Justice publication Trial News on litigating
25 consumer protection cases.

1 5. I am actively involved in professional organizations and nonprofits engaged in
2 consumer protection and debt collection abuse litigation. I am a member of the National
3 Association of Consumer Advocates and an Eagle member of the Washington State Association
4 for Justice. I am co-chair of the Washington Association of Justice's Consumer Protection
5 Section. I sit on the Board of the Northwest Consumer Law Center, an organization which is
6 primarily focused on providing pro-bono and low-bono legal services to low and moderate-
7 income Washington residents relating to consumer issues. I was named a Super Lawyers Rising
8 Star.

9 6. I actively participate in and attend CLEs, conferences, and social justice talks that
10 focus on consumer law issues. I was a guest lecturer at Seattle University School of Law's
11 Consumer Advocacy Clinic, where I spoke on Washington and federal debt collection law. In
12 2017, I was a presenter at a Washington State Association of Justice CLE, where I spoke on how
13 to run a successful consumer law practice. I have presented on the issue of debt collection
14 abuse twice during Social Justice Mondays held at Seattle University School of Law. I attended
15 the Consumer Rights Litigation Conference hosted by the National Consumer Law Center in
16 2014, 2016, 2018 and 2019. I am presenting at the upcoming National Consumer Law Center
17 Civil Rights Limitation Conference which is being held in Seattle. I have attended over 60 hours
18 of continuing legal education classes on consumer and debt collection abuse litigation. I also
19 mentor other consumer attorneys and law students looking to become consumer attorneys and
20 regularly co-counsel with attorneys new to the practice of consumer law and debt defense.

21 7. Since 2008, I have volunteered at the King County Bar Association's
22 Neighborhood Legal Clinics. For the last nine years, I have volunteered in my capacity as a debt
23 defense and bankruptcy attorney. I am also a volunteer attorney for the Northwest Justice
24 Project's debt clinic located in the King County Superior Court Law Library.

25 8. Plaintiffs responded to MOE's interrogatories and requests for production and
26 MOE deposed both Plaintiffs.

1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 EXECUTED AND DATED this 9th day of November, 2022.

4 By: /s/ Samuel R. Leonard
5 Samuel R. Leonard, WSBA #46498
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