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*Attorneys for Plaintiff Adnan Ansar
and the Proposed Settlement Class*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ADNAN ANSAR, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

THE GILL CORPORATION,

Defendant.

Case No. 2:24-cv-08875-MEMF-PD

Judge Maame Ewusi-Mensah Frimpong

**DECLARATION OF ANDREW G.
GUNEM**

Date: September 3, 2026

Time: 10:00 a.m.

Location: Courtroom 8B

DECLARATION OF ANDREW G. GUNEM

1 1. I am counsel for Plaintiff Adnan Ansar in the above-captioned case. This
2 declaration supports Plaintiff's Unopposed Motion for Attorney Fees, Costs, and Service Award.
3 I have personal knowledge of the facts set forth in this declaration and could testify competently
4 to them if called upon to do so.

5 2. To conserve judicial and party resources, Plaintiff and Defendant (together, the
6 "Parties") agreed to engage in formal mediation. Prior to mediation, the Parties exchanged
7 informal discovery—which enabled the Parties to better evaluate the strengths and weaknesses of
8 the underlying claims and defenses.

9 3. Additionally, the Parties provided the mediator with detailed mediation statements
10 that explained their respective positions.

11 4. On May 14, 2025, the Parties engaged in formal mediation with Jill R. Sperber,
12 Esq. of Sperber Dispute Resolution.

13 5. During the mediation, the Parties engaged in extensive arm's-length negotiations.
14 Notably, the Parties agreed not to negotiate attorney fees or the service award until the core terms
15 of a settlement were finalized (as to avoid any conflicts).

16 6. Under the guidance of the mediator, the Parties eventually reached an agreement
17 on the core terms of the Settlement.

18 7. Over the following months, the Parties continued to negotiate the finer terms of the
19 Settlement—and on July 30, 2025, the Settlement Agreement was executed.

20 8. On October 2, 2025, the Court held a hearing and provided additional guidance
21 regarding the settlement agreement and notices. Over the following weeks, the Parties collaborated
22 in good faith to cure the identified deficiencies.

23 9. Through the filing of this Motion, Class Counsel devoted a total of 135.3 hours to
24 the investigation, prosecution, settlement, and resolution of this action, resulting in a lodestar of
25 \$88,552.50. The time expended and hourly rates charged are reasonable in light of the nature of
26 the litigation, the work performed, the results achieved, and the experience of the attorneys and
27 staff involved.

10. The hourly rates at Strauss Borrelli PLLC range from \$200 for paralegals to \$800 for named partners.

Timekeeper	Position	Hourly Rate	Hours	Lodestar
Samuel Strauss	Partner	\$800.00	14.80	\$11,840.00
Raina Borrelli	Partner	\$800.00	7.40	\$5,920.00
Cassandra Miller	Partner	\$725.00	47.70	\$34,582.50
Andrew Gunem	Associate	\$550.00	46.70	\$25,685.00
Carly Roman	Associate	\$600.00	17.00	\$10,200.00
Megan Wang	Paralegal	\$200.00	1.40	\$280.00
John Erickson	Legal Assistant	\$150.00	0.30	\$45.00
TOTAL			135.30	\$88,552.50

11. Here, the requested attorney fees of \$100,000 equate to a multiplier of 1.13 (i.e., \$100,000 divided by \$88,552.50 equals 1.129), which is well within the range commonly approved in class action settlements.

12. Set forth below is a summary of each timekeeper's qualifications, hourly rate, hours worked, and the nature of the services performed in this litigation.

a. **Samuel J. Strauss** is the founding and managing partner of Strauss Borrelli PLLC and has extensive experience litigating complex class actions, particularly in the areas of consumer protection, privacy, and data breach litigation. Mr. Strauss billed 14.8 hours at an hourly rate of \$800. Throughout this litigation, Mr. Strauss provided senior-level oversight and strategic direction concerning the prosecution, settlement, and resolution of the action. His work included supervising the litigation, advising on settlement strategy and negotiations, overseeing settlement approval proceedings, and reviewing work performed in connection with settlement administration and preparation of the fee petition.

b. **Raina C. Borrelli** is a founding and managing partner of Strauss Borrelli PLLC and has extensive experience litigating complex class actions, including data privacy, consumer protection, and TCPA matters in state and federal courts nationwide. Ms. Borrelli billed 7.4 hours at an hourly rate of \$800. Ms. Borrelli provided partner-level supervision and strategic

1 guidance throughout the litigation, including reviewing and revising the Complaint, evaluating
2 settlement strategy, assisting with mediation preparation, reviewing and negotiating settlement
3 terms, evaluating settlement administration proposals, reviewing preliminary approval materials,
4 analyzing the Court's tentative ruling, and advising regarding implementation of the notice
5 program and settlement process.

6 c. **Cassandra P. Miller** is a partner at Strauss Borrelli PLLC and has more
7 than twenty years of experience litigating complex class actions, including data breach and privacy
8 matters. Ms. Miller billed 47.7 hours at an hourly rate of \$725. Ms. Miller played a significant role
9 in the management and resolution of this action. Her work included evaluating claims and
10 defenses, developing settlement strategy, coordinating mediation efforts, drafting and responding
11 to Rule 408 information requests, preparing settlement demands, negotiating settlement terms with
12 defense counsel, revising and negotiating the Settlement Agreement, supervising preparation of
13 preliminary approval filings, preparing for and participating in preliminary approval proceedings,
14 responding to the Court's tentative ruling, overseeing revisions to settlement documents and notice
15 materials, coordinating with the Settlement Administrator, obtaining a final approval hearing date,
16 and assisting with preparation of the instant fee motion and final approval filings.

17 d. **Carly M. Roman** is an attorney at Strauss Borrelli PLLC whose practice
18 focuses on complex class action litigation, including consumer protection, privacy, data breach,
19 and TCPA matters. Ms. Roman billed 17.0 hours at an hourly rate of \$600. Ms. Roman assisted
20 with the preliminary approval process following issuance of the Court's tentative ruling. Her work
21 included analyzing the tentative ruling, revising settlement documents and notice materials,
22 drafting portions of the supplemental motion for preliminary approval, coordinating revisions with
23 defense counsel, preparing hearing materials, reviewing declarations and exhibits, communicating
24 with the Settlement Administrator regarding notice procedures, and assisting with implementation
25 of the Court-approved notice program.

26 e. **Andrew G. Gunem** is an attorney at Strauss Borrelli PLLC whose practice
27 focuses on complex class action litigation, including consumer protection, privacy, data breach,
28

1 and TCPA matters. Mr. Gunem billed 46.7 hours at an hourly rate of \$550. Mr. Gunem performed
2 the primary day-to-day litigation and settlement work in this action. His responsibilities included
3 investigating the facts and circumstances surrounding the Data Breach, drafting the Complaint,
4 researching legal and factual issues, preparing mediation materials, participating in settlement
5 negotiations, drafting and revising the Settlement Agreement and related documents, preparing the
6 Motion for Preliminary Approval and supporting papers, reviewing and responding to the Court's
7 tentative ruling, drafting the supplemental preliminary approval filings and revised notice
8 documents, coordinating with the Settlement Administrator, reviewing the Court's preliminary
9 approval order, and preparing the instant Motion for Attorneys' Fees, Costs, and Service Award.

10 f. **Megan Wang** is a paralegal at Strauss Borrelli PLLC. Ms. Wang billed 1.4
11 hours at an hourly rate of \$200. Ms. Wang provided litigation support and filing assistance,
12 including researching Court procedures, communicating with chambers regarding scheduling
13 matters, preparing and filing proposed orders and stipulations, and assisting with the compilation
14 of billing and expense information in support of this Motion.

15 g. **John Erickson** is a legal assistant at Strauss Borrelli PLLC. Mr. Erickson
16 billed 0.3 hours at an hourly rate of \$150. Mr. Erickson assisted with preliminary factual
17 investigation and background research concerning the Data Breach and preparation of
18 informational materials relating to the incident.

19 13. The Settlement provides monetary relief that aligns with—and even exceeds—
20 analogous data breach class actions.

21 14. Here, the Settlement provides \$300,000 for a class of approximately 3,232, which
22 equates to a value of \$92.82 per person (i.e., \$300,000 divided by 3,232 equals 92.8217821782).

23 15. Class Counsel worked in good faith with Defendant to effectively address the
24 deficiencies that the Court identified in the Settlement Agreement and notice documents.

25 16. Class Counsel prosecuted this case on a wholly-contingent basis for over nineteen
26 (19) months.

17. In doing so, Class Counsel invested \$88,552.50 in lodestar and \$12,884.20 in costs while accepting the substantial risk of zero recovery.

18. Class Counsel respectfully requests reimbursement of \$12,884.20 for litigation costs.

19. Class Counsel incurred litigation costs of \$12,884.20 in reasonable and necessary litigation expenses, including legal research expenses, mediation fees, service of process expenses, and mailing expenses. These expenditures were incurred in furtherance of the prosecution, settlement, and resolution of this action.

Description	Amount
Research	225.00
Mediation	12,450.00
Service Fees	85.00
Mailing	124.20
TOTAL	\$12,884.20

20. These costs were reasonable and necessary, and Class Counsel respectfully requests reimbursement pursuant to the Settlement Agreement.

21. In addition to suffering the consequences of the Data Breach, Plaintiff actively participated in the prosecution and resolution of this action on behalf of the Settlement Class. Throughout the litigation, Plaintiff communicated regularly with Class Counsel, provided information concerning the Data Breach and its impact on him, reviewed pleadings and settlement-related documents, remained available to respond to counsel's requests, and assisted in evaluating and resolving the claims asserted in this action. Plaintiff also undertook the responsibilities and risks associated with serving as the named representative in a class action against his employer, including devoting time to the litigation, monitoring the progress of the case, and acting in the best interests of the Settlement Class. Plaintiff's efforts contributed meaningfully to achieving the Settlement and materially contributed to the successful resolution of this litigation. Accordingly,

1 the requested \$5,000 Service Award is reasonable and appropriate compensation for Plaintiff's
2 time, efforts, and service to the Settlement Class.

3 22. Pursuant to Civil Standing Order IX(E), Plaintiff and Defendant met and conferred
4 regarding the attorney fees, costs, and service award requested herein. Prior to that conference,
5 Plaintiff provided Defendant with information and materials sufficient to evaluate the requested
6 relief and the basis therefor. Following the meet-and-confer process, Defendant advised that it
7 does not oppose the relief requested herein.

8 * * * * *

9 Pursuant to 28 U.S.C. § 1746, I declare and sign under penalty of perjury of the United
10 States of America that the foregoing is true and correct.

11
12 Dated: June 4, 2026

Respectfully submitted,

13 By: /s/ Andrew G. Gunem

14 Andrew G. Gunem

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