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8 *Attorney for Plaintiff*

9 **IN THE UNITED STATES DISTRICT COURT**
EASTERN DISTRICT OF WASHINGTON

10 RYAN DALEY, and individual, and)
11 ISAAK CURRY, an individual, each on)
behalf of himself and all others)
12 similarly situated,)

13 Plaintiffs,
14 vs.

15 GREYSTAR REAL ESTATE)
PARTNERS, LLC, a Delaware limited)
liability company; GREYSTAR)
16 MANAGEMENT SERVICES, L.P., a)
Delaware corporation; GREYSTAR RS)
17 WEST, LLC, a Delaware limited)
liability company,)
18)
19 Defendants.)

Case No.: 2:18-CV-00381-SMJ
DECLARATION OF COUNSEL
BRIAN G. CAMERON IN
SUPPORT OF PLAINTIFFS'
MOTION FOR AWARD OF
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARDS

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21 **DECLARATION OF COUNSEL BRIAN G.**
CAMERON IN SUPPORT OF PLAINTIFFS'
MOTION FOR AWARD OF ATTORNEYS' FEES,
COSTS, AND SERVICE AWARDS - 1

1 The undersigned, under penalty of perjury of the laws of the United States,
2 28 U.S.C § 1746, declares as follows:

3 1. I am over the age of 18, am competent to testify, and have personal
4 knowledge of the facts alleged in this Declaration.

5 2. I am a member in good standing admitted to practice by the
6 Washington State Bar Association.

7 3. I am one of the attorneys for Plaintiffs Ryan Daley and Isaak Curry in
8 the above-captioned matter.

9 4. I have served as a principal at the law firm of Cameron Sutherland,
10 PLLC, since 2012, during which time I have represented clients in complex
11 consumer protection and consumer rights cases, including individual and class-
12 action litigation, in both state and federal courts.

13 5. I am a recognized authority in consumer protection and landlord-
14 tenant practice, with formal credits for developing and presenting Continuing
15 Legal Education (CLE) and professional training courses for the Spokane County
16 Bar Association (SCBA), Northwest Justice Project (NJP), Spokane Neighborhood
17 Assistance Program (SNAP), and other legal and community organizations.

18 6. I have served as lead counsel and co-counsel in multiple, precedent-
19 setting consumer protection and tenancy rights cases before Washington's
20 Supreme Court and Appellate Courts, including *Young v. Toyota Motor Sales,*
U.S.A., 196 Wn. 2d 310, 313, 472 P.3d 990, 992 (2020); *Silver v. Rudeen Mgmt.*
Co., Inc., 197 Wn. 2d 535, 540, 484 P.3d 1251, 1253 (2021); *Goodeill v. Madison*
Real Est., 191 Wn. App. 88, 91, 362 P.3d 302, 303 (2015); and others.

21 DECLARATION OF COUNSEL BRIAN G.
CAMERON IN SUPPORT OF PLAINTIFFS'
MOTION FOR AWARD OF ATTORNEYS' FEES,
COSTS, AND SERVICE AWARDS - 2

1 7. Since 2015, I have regularly volunteered to serve as counsel for
2 otherwise *pro se* consumer defendants at Spokane County District Court's weekly
3 civil hearings docket in conjunction with Spokane County Bar Association's
4 Volunteer Lawyers Program (VLP).

5 8. I am the recipient of the Spokane County Bar Association's 2019
6 Howard Herman Achievement Award for my professional service to the
7 Association's Consumer Advocacy Program, which provides access to legal
8 assistance on consumer rights issues for persons with moderate income.

9 9. Because the majority of my practice involves representing moderate
10 income and economically distressed individuals, my standard practice is to accept
11 a nominal retainer fee or no retainer fee from my clients, including the Plaintiffs
12 herein. The majority of my fees are earned on a contingency basis under fee-
13 shifting statutory provisions, which they were here.

14 10. A true and correct copy of my time records associated with my work
15 on the Plaintiffs' case is attached to the Declaration of Kirk D. Miller (ECF No.
16 137), which has been filed contemporaneously with my Declaration herein.

17 11. My firm's contingent hourly rate for firm principals involved with
18 class action litigation, including myself, is four hundred and twenty-five dollars
19 (\$425.00) per hour.

20 12. I have investigated and am familiar with the rates charged by
21 attorneys in Spokane, Washington. I believe that a contingent rate of \$425.00 per
hour for a firm principal and attorney with my qualifications and experience is well
within the market rate for class counsel in this area.

 13. I am aware that comparable rates of class counsel practicing in this
jurisdiction are in excess of \$700.00 per hour.

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SIGNED at Spokane, Washington, this 27th day of August, 2021.

s/ *Brian G. Cameron*
BRIAN G. CAMERON, WSBA #44905

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CM/ECF CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of August, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Benjamin J Stone	<u>Benjamin.Stone@lewisbrisbois.com</u>
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s/ Teri A. Bracken

Paralegal

DECLARATION OF COUNSEL BRIAN G. CAMERON IN SUPPORT OF PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS - 5