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2026 APR -1 P 4: 22

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

THOMAS SILVER, an individual, and all
those similarly situated,

Plaintiff,

vs.

RUDEEN MANAGEMENT COMPANY,
INC., a Washington corporation,

Defendant.

Case No. 17-2-03103-2

**DECLARATION OF ATTORNEY
BRIAN CAMERON RE: ATTORNEYS'
FEES**

The undersigned, BRIAN G. CAMERON, on oath declares upon penalty of perjury under the laws of the State of Washington that the following is true and correct:

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

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

3. I am a co-counsel of record for the Plaintiff, Thomas Silver, whom I have represented from the inception of this action, through appeals before Washington's appellate and Supreme courts, and in the full course of litigation after remand.

DECLARATION OF ATTORNEY BRIAN
CAMERON RE: ATTORNEYS' FEES - 1

Cameron Sutherland, PLLC
827 W. 1st Ave., Ste 301
Spokane, WA 99201
(509) 315-4507

1 4. To date, I have expended at least 463.6 hours on legal services directly related to
2 the claims against Defendant, including researching and developing individual and putative class
3 claims; compiling and analyzing evidence; drafting and editing pleadings; and engaging in
4 motion practice. True and correct copies of my contemporaneous time records are attached
5 hereto as **Exhibit A**.

6 5. This litigation commenced in 2017 and involved complex issues of law, including
7 issues of first impression, specialized class action rules and procedures, and multiple parties with
8 varying profiles and interests.

9 6. Following its erroneous dismissal by the trial court, this case was subsequently
10 appealed and argued before Washington's Division III Court of Appeals and again before
11 Washington's Supreme Court, which reversed and remanded the lower courts' decisions.

12 7. Because the overwhelming majority of my practice involves representing
13 underrepresented and/or economically limited persons, my standard practice is to accept a
14 nominal retainer fee or no retainer fee from my clients. Virtually all of my fees are earned on a
15 contingency basis under fee-shifting statutory provisions.

16 8. Class action litigation requires enormous time and cost investment relative to
17 individual civil actions due to special procedural requirements, the expanded scope of discovery,
18 larger number of putative class members, and class administration. In many cases, such as this
19 one, these time and costs investments may be imposed over many years, deferring potential
20 recovery and presenting substantial economic risks to both the class representative and class
21 counsel.

22 9. My contingent hourly rate as class counsel in this case is set at \$625.00 per hour.
I have investigated and am familiar with the rates charged by attorneys in Spokane, Washington.

23 I believe that a class action contingent rate of \$625.00 per hour for a firm principal and attorney

24 DECLARATION OF ATTORNEY BRIAN
CAMERON RE: ATTORNEYS' FEES - 2

Cameron Sutherland, PLLC
827 W. 1st Ave., Ste 301
Spokane, WA 99201
(509) 315-4507

1 with my qualifications and experience is well within the market rate for this area. Due to the
2 highly specialized nature of class action practice, attorneys competent in this practice area
3 operate in a statewide marketplace, including Seattle-area counsel who are routinely approved at
4 more than \$1,000 per hour.

5 10. I have previously been approved for a class action contingency rate of \$625.00
6 per hour by courts in Spokane County, with an unopposed request of \$675 per hour pending in
7 other class litigation.

8 11. During the course of this litigation, I and my firm associated with the firm of Kirk
9 D. Miller, PS (KDM), to pursue Mr. Silver's claims on a class-wide basis.

10 12. Between 2019 until late 2023, Mr. Miller's firm operated at the logistical "hub"
11 for case administration in this matter, including primary roles in case file management,
12 timekeeping, budgeting and accounting, and related functions.

13 13. Mr. Miller died in December 2023, ending his solo practice.

14 14. I have compiled time records from those available through my own firm's record
15 management systems, including time before, after, and, to a lesser extent, during my firm's
16 association with KDM.

17 15. Since Mr. Miller's death, I have been unable to access complete time records
18 maintained by KDM between 2019 and 2023, including all of 2022.

19 16. During the entirety of 2022, I estimate that I expended at least 40 hours of
20 attorney time litigating this matter. I have included this amount of time within the total
21 calculations presented in Exhibit A herein. I have *not* included at least 100 hours that I believe
22 were expended during the course of my association with KDM, the records of which appear to
23 have been lost or otherwise rendered inaccessible following his death in December 2023.

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CERTIFICATE OF SERVICE

I hereby declare upon penalty of perjury under the laws of the state of Washington that on the date stated below I served a copy of this document in the manner indicated:

PISKEL YAHNE KOVARIK, PLLC
612 W. Main Ave., Ste. 207
Spokane, WA 99201
Attn:
Ryan D. Yahne
Whitny Norton
William Emmal

First Class U.S. Mail
 E-Mail:
wnorton@pyklawyers.com;
wemmal@pyklawyers.com;
ryahne@pyklawyers.com
 Hand Delivery
 Next Day Air

DATED this 1st day of April 2026.

s/ Bonnie Morey
Bonnie Morey, Legal Assistant

DECLARATION OF ATTORNEY BRIAN
CAMERON RE: ATTORNEYS' FEES - 5

Cameron Sutherland, PLLC
827 W. 1st Ave., Ste 301
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EXHIBIT A

TIME COMPILATION

Brian G. Cameron

Silver v. Rudeen Management Company, Inc.

Spokane District Court No. 17-2-03103-2

CLIENT	DATE	DESCRIPTION	TIME	RATE	TOTAL
	2017				
Silver, Thomas	05/01/17	CONF CLT re: case status, defenses to claims, litigation strategy	0.4		
Silver, Thomas	05/08/17	Rs. RCW 59.18.260, RCW 59.18.270, RCW 59.18.280 re: deposit collection/withholding	4.0		
Silver, Thomas	05/10/17	Rs. cases incl. <i>Goodeill</i> , etc., re: withholding statement requirements	2.4		
Silver, Thomas	05/11/17	Rvw. case file re: tenancy documents, communications, LL claims	1.1		
Silver, Thomas	05/22/17	Draft internal memo re: claims per "estimated" deposit statements/refunds	2.0		
Silver, Thomas	06/14/17	Draft Summons and Compl.	3.5		
Silver, Thomas	06/15/17	Draft Summons and Compl., cont.	2.6		
Silver, Thomas	06/27/17	CONF CLT re: additional evidence	0.5		
Silver, Thomas	07/17/17	Revise S&C	0.5		
Silver, Thomas	08/01/17	Finalize S&C for filing/service	0.5		
Silver, Thomas	08/31/17	Rvw./verify Decl. Svc.	0.1		
Silver, Thomas	09/05/17	Rvw./verify NOA atty Michael Whipple	0.1		
Silver, Thomas	09/26/17	Rvw./verify/annotate DFs Answer	1.1		
Silver, Thomas	10/26/17	Rvw./verify NOA substitution atty Tim Durkop	0.1		
Silver, Thomas	11/03/17	CONF OC re: amended Answer	0.3		
Silver, Thomas	11/17/17	Rvw./verify/annotate DFs amended Answer; calendar CSO	0.8		
Silver, Thomas	12/28/17	Recalendar amended CSO	0.3		
	2018		0		
Silver, Thomas	01-16	Rvw. Order of Pre-assignment Moreno; rsch. CRs re: time for dispositive motions; CONF CC	0.4		
Silver, Thomas	02-07	Rs. DFs M/Dismiss re: SoL applications to RCW 59.18; outline issues for verification/response; CONF PLGL re: RCW 4.16	1.4		
Silver, Thomas	02-13	Rs. 4.16, et seq.; analyze lease documents, disposition notices; outline arguments	5.5		
Silver, Thomas	02-14	Rs. cases, Stenberg, Lewis, Sorey, Seattle Engineers, etc.; DR1 Memo Response 33%	5.0		
Silver, Thomas	02-15	DR1 Memo Response 100%; Decl. Cameron	4.8		
Silver, Thomas	02-22	Rvw./annotate M/Dismiss briefs, cases	1.5		
Silver, Thomas	02-16	Compile Ex.; serve OC re PFs Response to DFs M/Dismiss	0.5		
Silver, Thomas	03-15	Prep. HRNG re: DFs M/Dismiss	1.0		
Silver, Thomas	03-16	HRNG Present; Debrief	2.5		
Silver, Thomas	04-16	DR1 M/Recon; file	1.2		

Silver, Thomas	04-17	CONF CLT re: M/Recon, bases/process re: Appeal	1.0		
Silver, Thomas	04-23	Response DFs M/Award of Fees	1.2		
Silver, Thomas	06-26	Rvw./verify ruling, orders re: M-Recon, M-Costs/Fees; CONF CC re: appeal; DR1 Notice of Appeal	1.6		
Silver, Thomas	07-30	DR1, file, serve Report of Proceedings; Statement of Arrangements;	0.8		
Silver, Thomas	10-30	MSGs OC re: M-Extension; DR1 M-Extension	0.5		
Silver, Thomas	12-17	Rvw. case file, transcripts; rsch. cases incl. Stenberg, et al.	1.5		
Silver, Thomas	12-18	Rsch. cases, statutes re: SoL; outline brief; CONF CC	6.5		
Silver, Thomas	12-19	Rsch. cases, statutes, facts/evidence; DR1 Appellant's Brief	9.6		
Silver, Thomas	12-19	DR2 Brief, edits, citations; CONF CC; DR3 edits	6.2		
	2019		0		
Silver, Thomas	03-09	Rsch. RCW 59.18.280, cases, state analogs	2.2		
Silver, Thomas	03-11	Rvw./verify Respondent's Brief; rsch. RCW 59.18.280; RCW 4.16.080; DR1 Appellant's Reply brief	3.5		
Silver, Thomas	05-01	MSG respond CLT re: appellate procedure, timelines, case status	0.1		
Silver, Thomas	06-12	M/Oral Argument; NOA CC; CONF CC re: case status; MSGs OC	0.5		
Silver, Thomas	10-07	CONF CLT re: Div. III ruling; SCOW appeal	1.0		
Silver, Thomas	10-15	Analyze/annotate Div. 3 opinion; rsch. citations, case law re: trusts; verify Compl.	3.8		
Silver, Thomas	10-17	Rsch. cases re: SOL; rvw. pleadings; DR1 M/Reconsideration	3.0		
Silver, Thomas	12-18	Rvw. appellate records; rsch. RCW 59.18, et seq.; DR1 Petition for Review 20%	2.2		
Silver, Thomas	12-19	DR1 Petition for Review	3.8		
Silver, Thomas	12-23	DR2 Petition for Review, appendices, citations	3.5		
	2020		0		
Silver, Thomas	04-29	Rvw./annotate DFs Response to PFs Petition; verify citations, authorities	1.0		
Silver, Thomas	05-06	CONF Northwest Justice Project, Columbia Legal Services re: amici	0.6		
Silver, Thomas	05/29/20	CONF CC, OC, plgl. re: M/Continue Supplemental Briefing; rvw./revise proposed Motion	0.3		
Silver, Thomas	06/05/20	Revise PTs Supplemental Brief re: Petition for Review; compile/verify citations; MSGs CC	3.1		
Silver, Thomas	06/08/20	Revise PTs Supplemental Brief; finalize documents for filing	1.5		
Silver, Thomas	06/09/20	Rvw. RPs supplemental brief; verify citations; annotate arguments	1.0		
Silver, Thomas	06/11/20	CONF Amicus re: case history, appellate arguments, applicable law; rvw. CT scheduling notice; compile briefing	0.5		
Silver, Thomas	06/12/20	CONF amicus NJP re: issues, positions, schedules	0.8		
Silver, Thomas	06/16/20	Rvw. Response SCOW setting notice: MSGs amicus curiae	0.2		
	2021		0		
Silver, Thomas	04/22/21	Rvw. SCOW appellate ruling; CONF CLT, CC re: litigation strategy	2.6		

Silver, Thomas	04/26/21	CLT: CONF CLT re: DFs lien on property; CONF CC re: release of lien	1.2		
Silver, Thomas	06/25/21	DISC: DR2 PFs 1st Discovery Requests	2.0		
Silver, Thomas	08/04/21	Rvw./respond CLT MSG re: case status, discovery procedures	0.5		
Silver, Thomas	08/18/21	Rsch. Goodeill v. Madison per OC request; rvw. case file, evidence, respond CC	2.5		
Silver, Thomas	2022		0		
Silver, Thomas		<i>See Cameron Declaration, ¶¶ 11-16.</i>	40		
	2023		0		
Silver, Thomas	02/21/23	MSG OC re: overdue discovery responses	0.1		
Silver, Thomas	03/15/23	Rvw./analyze DFs partial discovery production	2.0		
Silver, Thomas	03/16/23	Further rvw. DFs discovery production	1.3		
Silver, Thomas	04/06/23	Rsch./draft M/Compel Compliance	6.0		
Silver, Thomas	04/07/23	Research/draft M/Comply	6.5		
Silver, Thomas	04/10/23	DR1 Decl. re: PFs M/Compel Compliance; DR3 Brief authorities, citations, review edits	2.1		
Silver, Thomas	06/30/23	Rvw./revise proposed amended order re: sanctions; DR2 M/Default	1.7		
Silver, Thomas	05/19/23	Prepare/present PFs M/Compel; CONF OC	1.5		
Silver, Thomas	07/14/23	CONF OC re: case status, M-Sanctions; CONF CC; CONF. plgl. re: supplemental declarations, re-noted HRNG	1.0		
Silver, Thomas	08/22/23	CONF OC re; discovery, ER408; debrief CC	2.0		
Silver, Thomas	08/30/23	Rvw. discovery orders; investigate DFs properties, tenancies, business structures; CONF CC re: ER408	1.5		
Silver, Thomas	08/31/23	MSG CLT re: Case Update; rvw. case file, scheduling orders, ER408	0.4		
Silver, Thomas	09/07/23	rsch./rvw. case history, vaulted files from 2016-present re: damages, costs, ER408	1.0		
Silver, Thomas	09/11/23	DISC: rvw. RCW 59.18.280 re: exemplary damages, RCW 59.18.030 re: definitions; rvw. sample Rudeen dispositions	1.0		
Silver, Thomas	09/27/23	Rvw./revise M/Stip Continue Class Deadlines, declaration, proposed Order	0.4		
Silver, Thomas	10/19/23	MSG OC re: overdue discovery production; CR 30(b)(6) deposition	0.1		
Silver, Thomas	10/26/23	Follow-up MSG OC re: overdue discovery production; CR 30(b)(6) deposition	0.2		
Silver, Thomas	11/06/23	Rvw. case record re: discovery disputes, motions, orders; CONF CC re: further motions Compel, Contempt, Subpoena	1.6		
Silver, Thomas	11/09/23	Investigate implicated business entities re: Kevin Rudeen governorship, formation docs., property records	4.0		
Silver, Thomas	11/14/23	CONF CC SJS re: enforcement of orders, judgments; judicial subpoenas; amending COMPL; MSG CT re: HRNG calendar	1.0		
Silver, Thomas	11/14/23	Rvw./verify DFs Notice of Sub; MSGs CC; process to file	0.3		

Silver, Thomas	11/30/23	Rvw./verify DFs M/Stay, memo, decls.; CONF CC re: response; MSGs OC re: CR30(b)(6); outstanding discovery	2.0		
Silver, Thomas	12/06/23	Rvw./verify/annotate DFs M/Stay; MSG CLT; CONF CC re: response; MSGs CLT re: case status	2.5		
Silver, Thomas	12/07/23	Rschr./outline PFs Response to DFs M/Stay; CONF CC re: briefing	4.0		
Silver, Thomas	12/08/23	Draft/revise PFs Response to DFs M/Stay; Draft Declaration/Exhibit; file/serve	8.2		
Silver, Thomas	12/13/23	Rvw./verify DFs Reply re: M-Stay; CONF CC re: hearing presentation	2.1		
Silver, Thomas	12/14/23	Rvw. DFs request for stipulated hearing note; CONF CC: regarding scheduling, DF's discovery response status, accommodations for substituted counsel; respond OC	0.6		
Silver, Thomas	12/15/23	Rvw./verify DFs proposed stipulation re: compliance with Court orders; CONF CC re: DFs proposed limitations on production;	1.0		
Silver, Thomas	12/18/23	Respond CC re: DFs demand to file stipulation, PFs response, litigation strategy	0.3		
Silver, Thomas	12/21/23	Rvw./respond OC past-date discovery demands, complaints re: DFs former counsel; requests for clarification; verify OC assertions, discovery rules, Case Scheduling Order, procedural history; draft response to OC	1.2		
Silver, Thomas	01/02/24	Rvw./respond DFs limited production re: class contact information, notice of subpoena re: Durkop	0.5		
Silver, Thomas	01/05/24	Investigation of DF claims/production re: DF Rudeen-governed properties (x100+), locations, units, dates; compile memo re: current status re: DFs production obligations	4.0		
Silver, Thomas	01/08/24	Continuing investigation of DF 100+ properties; compile property profile data	4.5		
Silver, Thomas	01/09/24	CONF CC re: PFs response to DFs improperly noted Motion, ER408 violations, supplemental response	1.0		
Silver, Thomas	01/10/24	Rvw./verify DFs amended M/Stay, supplemental Memo ISO; rschr. court records, case file, communications; CONF CC re: response	2.2		
Silver, Thomas	01/11/24	Compile evidence/exhibits; first draft PF's response brief	7.7		
Silver, Thomas	01/12/24	Revise/edit 2d draft PFs response brief; declarations, compile/prepare exhibits A-H, finalize for filing/service	5.5		
Silver, Thomas	01/14/24	Investigate DFs advertised property portfolio v. DFs deficient disclosure	1.5		
Silver, Thomas	01/16/24	Rvw. DFs proposed Class Notice; CONF CC	0.5		
Silver, Thomas	01/17/24	Rvw. verify DFs supplemental Reply re: Amended M/Stay; draft PFs proposed Class Notices; MSGs OC re: notices, class administrator, etc.	1.0		

Silver, Thomas	01/18/24	Draft/revise motion presentation, compile evidence re: DF property holdings, discovery obligations/disclosures	3.0		
Silver, Thomas	01/19/24	Prepare/present HRNG re: DFs M/Stay; debrief CC	3.0		
Silver, Thomas	01/24/24	MSG CLT re: HRNG on DFs M/Stay	0.2		
Silver, Thomas	02/12/24	Rvw./compile/scan DFs discovery production	1.5		
Silver, Thomas	02/14/24	CONF CC re: DFs pending M/Vacate; class member identification/administration	1.0		
Silver, Thomas	02/15/24	CONF Plgl. re: DFs discovery production; compile and inventory paper copies	1.0		
Silver, Thomas	02/23/24	Rvw./annotate DFs M/Vacate, declarations, orders; CONF CC re: response	2.2		
Silver, Thomas	02/26/24	Rvw./compile/scan DFs discovery production	2.5		
Silver, Thomas	02/27/24	Rsch. authorities re: PFs responses to DFs M/Vacate	4.0		
Silver, Thomas	02/28/24	Rsch. SCDC docket records re: ATTY litigation activities; commission SCBA research/compilation services; AOC request	5.5		
Silver, Thomas	02/29/24	Rsch./Draft Response DFs M/Vacate sections re: Burnet, voidability, continuances	9.5		
Silver, Thomas	03/01/24	Draft/Edit final Response DFs M/Vacate; citations; compile exhibits; finalize for filing	6.0		
Silver, Thomas	03/06/24	Rvw. case file re: former counsel communications; CONF CC re: supplemental briefing	1.0		
Silver, Thomas	03/07/24	Rvw./verify DFs Reply re: M/Vacate; CONF CC re: oral argument; rvw. DFs unnegotiated statement re: review of PFs case records and CONF CC regarding response	1.0		
Silver, Thomas	03/08/24	Prep./present HRNG re: DFs M/Vacate	7.5		
Silver, Thomas	03/11/24	Rvw. HRNG notes, case file, DR1 findings/conclusions re: proposed Order; rvw./respond DF re: supplemental d'scovery/scans	3.5		
Silver, Thomas	03/12/24	Rvw./respond MSGs from OC re: discovery files, proposed presentment; revise proposed order re: oral ruling; CONF CC re: ER408 terms	1.5		
Silver, Thomas	03/13/24	MSGs CT re: HRNG transcript; coord. delivery of discovery files to Naegli; CONF CLT re: case status, sanctions award	1.5		
Silver, Thomas	03/19/24	Prelim rvw. re: DFs discovery production (x 37,000 pages), objections; CONF CC re: responses to objections, class administrations scheduling, class notice forms	4.1		
Silver, Thomas	03/20/24	Rvw./verify DFs memo ISO objections; rvw. case record, hearing transcripts, communications; draft PFs Report Re; DFs production; CONF plgl. re: document compilation/production, data processing procedures/requirements	6.5		
Silver, Thomas	03/21/24	Revise PFs Report re: DFs production and objections; finalize citations, filing/service; CONF Class Administrator re: notification plan, contingencies re: exclusions, etc.	4.1		

Silver, Thomas	03/22/24	CONF Plgl. re: DFs discovery production; data compilation/analysis; legal issues; evidence standards; project management	1.5		
Silver, Thomas	03/25/24	Rvw./verify DFs proposed Order re: denied M/Vacate	0.4		
Silver, Thomas	03/26/24	DFs discovery compilation/analysis	0.5		
Silver, Thomas	03/28/24	CON CC/plgl. re: DFs refusal to produce electronic files of class administration data; M/Compel;	0.5		
Silver, Thomas	04/05/24	Rvw. DFs Notice of Appeal and attachments; rsch. RAP re: appeal cf. petition procedures; CONF CC re: DFs refusal to provide e-format files, M/Compel, class schedule	1.5		
Silver, Thomas	04/09/24	Compile/Analyze 30K BATES numbers; case status rvw. re: DFs M/Seal, PFs M/Administration Schedule	1.5		
Silver, Thomas	04/16/24	Rvw./analyze DFs paper production 30,000+ Bates	2.0		
Silver, Thomas	04/17/24	Rvw./analyze DFs paper production 30,000+ Bates,	2.4		
Silver, Thomas	04/24/24	Rvw./analyze DFs paper production 30,000+ Bates; CONF CC re: DFs objections to class inclusion; M/Seal; M/Administration Order	2.0		
Silver, Thomas	04/25/24	DR1 M/Administration Schedule, NFH	1.0		
Silver, Thomas	04/29/24	Rvw./annotate DFs proposed Orders; CONF CC	1.0		
Silver, Thomas	04/30/24	Rvw. DFs discovery production	2.0		
Silver, Thomas	05/06/24	PFs Reply, proposed Order re: class administration schedule	1.6		
	05/23/24	Rsch. RAPs re: appeal as right, discretionary appeals, default orders	2.5		
Silver, Thomas	05/24/24	Rsch./Draft PFs response to DFs M/Appeal per Div3	4.0		
Silver, Thomas	05/29/24	Draft PFs response to DFs M/Appeal	7.8		
Silver, Thomas	05/30/24	Revise/finalize PFs response to DFs M/Appeal; citations, tables	1.0		
Silver, Thomas	06/06/24	Rvw./annotate DFs brief re: appeal as right/discretion; Rsch. standards for interlocutory rvw.; CONF CC	2.0		
Silver, Thomas	06/07/24	Rvw. Order re: DFs objections; CONF CC re: ruling on "agreed" issues; rvw. briefing, order transcript, CONF CC re: M/Reconsideration	1.0		
Silver, Thomas	06/14/24	Compile/analyze DFs discovery production re: "white" category tenants, refunds claimed, inconsistencies	2.0		
Silver, Thomas	06/17/24	Draft M/Reconsideration, proposed order, declarations, exhibits	7.5		
Silver, Thomas	06/18/24	CONF CC re: DFs ER408 offer	0.5		
Silver, Thomas	06/24/24	Rvw. case files; respond CLT MSG re: Case Status	0.2		
Silver, Thomas	07/02/24	Rvw./verify DFs response to PFs M/Reconsideration; CONF CC re: Reply	1.8		
Silver, Thomas	07/03/24	Rvw./annotate DIV3 denial of DFs M/Discretionary Rvw.: CONF CC re: litigation strategy	1.1		
Silver, Thomas	07/08/24	Reply M/Reconsideration	4.0		
Silver, Thomas	07/08/24	Reply M/Reconsideration	3.5		
Silver, Thomas	07/25/24	Rvw./verify PFs M/Substitute Class Counsel; process to file	0.5		
Silver, Thomas	08/15/24	Rsch./draft PFs response to DFs M/Clarify	9.6		
Silver, Thomas	08/16/24	Revise PFs response to DFs m/Modify; citations; filing	3.0		

Silver, Thomas	09/04/24	Rvw./respond CLT MSG re: case updates	0.3		
Silver, Thomas	09/16/24	Rvw./verify DFs reply re: M/Clarify; annotate motion papers; CONF CC re: oral argument, litigation strategy, ER408	2.0		
Silver, Thomas	09/17/24	CONF CC re: litigation strategy, class administration, total class damages assessment	1.5		
Silver, Thomas	09/19/24	Prep. HRNG re: DFs M/Clarify	1.0		
Silver, Thomas	09/20/24	Rvw./annotate Court's Order re: DFs M/Clarify	0.2		
Silver, Thomas	09/27/24	Rvw/verify DFs M/Reconsider re: Order Granting DFs M/Clarify; CONF CC re: PFs response, pending discovery, ER408	2.5		
Silver, Thomas	09/30/24	Draft M/Strike DFs M/Reconsideration	3.6		
Silver, Thomas	10/01/24	Revise M/Strike per CC CONF; draft proposed Order; finalize for filing	3.0		
Silver, Thomas	10/21/24	Rsch./draft response DFs M/Recon re: M/Clarify	5.0		
Silver, Thomas	10/22/24	Draft/edit response DFs M/Recon re: M/Clarify	4.2		
Silver, Thomas	10/31/24	Rvw./annotate DFs reply re: DFs M/Recon re: M/Clarify; CONF CC re: sur-reply, M/Strike, litigation strategy	2.0		
Silver, Thomas	11/19/24	Rvw./annotate Order on DFs M/Reconsider	0.3		
Silver, Thomas	11/21/24	Draft Petition for Fees and Costs per Court Order; compile/verify time records, exhibits, declaration	2.0		
Silver, Thomas	12/03/24	Review/annotate DFs Objection, Declarations, proposed Order re: PF's fee petition	1.0		
Silver, Thomas	12/03/24	CONF co-counsel re: response to annotate DFs Objection, Declarations, proposed Order re: PFs fee petition	1.0		
Silver, Thomas	12/04/24	CONF co-counsel re: DFs omission of lease agreements from paper production	0.5		
Silver, Thomas	12/04/24	Outline PFs response to DFs objection re: PFs fee petition	1.2		
Silver, Thomas	12/04/24	Rvw./analyze/verify DF's production re: objections to class inclusion; identify/log deficiencies; CONF cocounsel re: response	1.5		
Silver, Thomas	12/19/24	Rvw. DFs response to PFs request for additional evidence, e-format, opposition to production re: class administration	1.0		
Silver, Thomas	12/21/24	Rvw./analyze/verify DF's production re: objections to class inclusion; identify/log deficiencies	1.5		
Silver, Thomas	12/22/24	Rvw./analyze/verify DF's production re: objections to class inclusion; identify/log deficiencies	1.5		
Silver, Thomas	12/23/24	Rvw./edit Reply re: DFs objection to fee petition	1.0		
Silver, Thomas	01/02/25	Rvw./analyze/verify DF's production re: objections to class inclusion; identify/log deficiencies	1.0		
Silver, Thomas	01/13/25	Rvw. CT Order re: fee petition	0.1		
Silver, Thomas	01/14/25	CONF CC re: identification of class administration deadlines; draft proposed class admn. scheduling order	1.0		
Silver, Thomas	01/15/25	Revise proposed class scheduling order per case calendars	0.3		
Silver, Thomas	01/16/25	Draft M/Scheduling Order	1.0		

Silver, Thomas	02/10/25	Rvw./verify/annotate DFs Response to PFs M/Scheduling Order	2.0		
Silver, Thomas	02/11/25	CONF CC re: Reply re: class scheduling order	1.0		
Silver, Thomas	02/12/25	Draft, edit, revise PFs Reply re: class scheduling order	6.5		
Silver, Thomas	02/26/25	Draft response DFs M/Decertify	4.5		
Silver, Thomas	02/27/25	Draft response DFs M/Decertify	6.5		
Silver, Thomas	02/28/25	Draft response DFs M/Decertify	8.5		
Silver, Thomas	03/05/25	Rvw./annotate DFs Reply re: DFs M/Decertify	1.0		
Silver, Thomas	03/07/25	Prep./present/debrief HRNG re: DFs M/Decertify	1.5		
Silver, Thomas	04/24/25	Rvw./revise class notice, schedule, proposed Order	0.5		
Silver, Thomas	05/27/25	Rsch./draft response to DFs M/Discretionary Appeal	3.0		
Silver, Thomas	05/29/25	Draft response to DFs M/Discretionary Appeal	5.5		
Silver, Thomas	06/18/25	Rvw./annotate DFs reply re: M/Discretionary Appeal	1.0		
Silver, Thomas	12/03/25	CONF CC re: ER408, mediation, response to DF counsel's confusion re: class notice	0.5		
TOTAL (date)			463.6	625.00	289,750.00

Common Abbreviations

[initials]	<i>denotes an individual by his or her initials (e.g., *KDM*)</i>
AFF	Affidavit
ATTY	Attorney
C&D	Cease and Desist
CC	Co-counsel
CLT	Client
COMPL	Complaint
CONF	Conference
CONT	Continue
CT	Court
DF	Defendant
DSCT	District Court
ER408	Settlement (i.e., protected by evidence Rule 408)
K	Contract
HRNG	Hearing
LL	Landlord
M/	Motion for . . .
OC	Opposing Counsel
OP	Opposing Party
PCLT	Prospective Client
PF	Plaintiff
PSJ	Partial Summary Judgment
REP	Representation
RSCH	Research
RWW	Review
S&C	Summons and Complaint
SJ	Summary Judgment
SPCT	Superior Court
Stip.	Stipulated/ion
TT	Tenant

FILED

2026 APR -1 P 4: 22

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR SPOKANE COUNTY

THOMAS SILVER, an individual, and all
others similarly situated,

Plaintiff,

v.

RUDEEN MANAGEMENT COMPANY,
INC., a Washington corporation,

Defendant.

No. 17-2-03103-2

**DECLARATION OF ATTORNEY
CHRISTOPHER HOGUE IN SUPPORT
OF ATTORNEYS' FEES AND COSTS**

I, CHRISTOPHER M. HOGUE, declare as follows:

1. I am over the age of eighteen, competent to testify, and make this declaration on my own personal knowledge. I am one of the attorneys for the Plaintiff and the Class in the above-entitled matter.

2. I have been actively litigating this class action litigation for over two years and was appointed by this Court as Co-Lead Class Counsel in July 2024.

3. I am a member of the Washington State Bar Association, in good standing, and have been admitted to practice law in Washington since 2014. I am also admitted to practice in the United States District Courts for the Eastern and Western Districts of Washington, as well as the United States Court of Appeals for the Ninth Circuit.

1 4. I have owned and operated my own law firm, Hogue Law Firm, since I began
2 practicing law.

3 5. I represent clients in state and federal court in both individual and class action
4 litigation. I have been approved by Washington courts as class counsel in class action lawsuits
5 and am actively litigating many class action and putative class action lawsuits. I perform all
6 aspects of litigation, including first-chairing jury and bench trials to verdict and appellate work.

7 6. Since I began my legal practice, I have primarily practiced in consumer rights
8 litigation, which includes representation of tenants for claims under the Residential Landlord
9 Tenant Act, RCW 59.18, *et seq.*, such as the instant matter.

10 7. I participate in the Inland Empire Legal Aid volunteer program (formerly known
11 as the Spokane Volunteer Lawyers Consumer Advocacy Program) and volunteer pro-bono hours
12 each month in Spokane's District Court for assisting low-income individuals on consumer
13 protection issues, including issues involving insurance companies, motor vehicle dealerships,
14 debt collection harassment or defense, and tenants' rights, among others.

15 8. Because a large part of my practice involves representing lower-income and/or
16 economically-distressed individuals and taking on lower value cases under fee-shifting consumer
17 protection statutes, my standard practice involves contingency work. Thus, the majority of my
18 attorney's fees in my legal practice are earned on a contingency basis under fee-shifting statutory
19 provisions.
20

21 9. My attorney's fees in this matter are entirely contingent. I have spent at least over
22 two hundred billable hours litigating this matter over multiple years without any compensation
23 from a client.

1 10. I have investigated and am familiar with the hourly rates that are generally
2 charged by attorneys practicing in both individual and class action litigation in Washington. My
3 contingent hourly rates are consistent with those of a firm principal that practices in complex
4 class action litigation that is often highly contested, risky, and requires a tremendous time and
5 cost investment.

6 11. My current hourly rate for contingent work on less complex individual cases
7 varies between \$475.00 – \$550.00 per hour, which has been court-approved within that range.
8 For complex class action litigation, my current contingent rate is from \$625.00 – \$675.00.
9 Approximately four years ago in 2022, my hourly rate for contingent work in consumer
10 protection class action litigation was approved at \$550.00 per hour in Washington. *Hillman v.*
11 *Evergreen Markets, et al*, King County Superior Court, No. 20-2-09385-8 SEA. Attorney hourly
12 rates that modestly increase over time are consistent with standard practice. This factors in both
13 an attorney’s increase in experience and qualifications over time, but also other factors such as
14 standard inflation over the years. *See, e.g.*, Federal Reserve Bank of Minneapolis, Consumer
15 Price Index 1913--, November 21, 2024 ([https://www.minneapolisfed.org/about-us/monetary-](https://www.minneapolisfed.org/about-us/monetary-policy/inflation-calculator/consumer-price-index-1913-)
16 [policy/inflation-calculator/consumer-price-index-1913-](https://www.minneapolisfed.org/about-us/monetary-policy/inflation-calculator/consumer-price-index-1913-))(reporting average inflation rates of 8.0
17 percent in 2022, 4.1 percent in 2023, and 3.2 percent in 2024).
18

19 12. While a percentage-of-recovery method is standard in class action litigation and
20 being requested in this case, a Lodestar cross-check is sometimes utilized by courts to confirm
21 that the requested percentage is appropriate.
22

23 13. For such Lodestar cross-check purposes, my minimum total hours spent on work
24 in this litigation is 236.4 hours. At my minimum contingent hourly rate of \$625.00, this would

1 equal \$147,750.00 in attorney's fees. Attached as Exhibit A is a true and correct copy of my
2 attorney timesheet in this matter.

3 I declare under penalty of perjury under the laws of the state of Washington that the
4 foregoing is true and correct.

5 DATED this 1st day of April 2026.

6 *Chris Hogue*

7 _____
8 CHRISTOPHER HOGUE
9 Attorney for Plaintiff and Class
10
11
12
13
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15
16
17
18
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23

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 1st day of April 2026, I caused to be served a copy of the
3 foregoing on the following person, in the manner indicated:

4 Ryan Yahne
5 Whitney Norton
6 William Emmal
7 PISKEL YAHNE KOVARIK, PLLC
8 612 W. Main Ave., Ste. 207
9 Spokane, WA 99201

- HAND DELIVERED
- U.S. MAIL
- OVERNIGHT MAIL
- VIA FACSIMILE
- VIA EMAIL

8 *Chris Hogue*

9 _____
Christopher Hogue

EXHIBIT A

TIMESHEET – *Silver v. Rudeen Management Company, Inc.*

RE: Silver v. Rudeen – Compiled Time Entries

Exhibit A

Christopher Hogue

CLIENT	DATE	ACTIVITY	TIME
Silver, Thomas	02-23-24	Discussion of Silver case background with CC; strategize plan moving forward re Def motion to show cause & discovery re Durkop and review of all pleadings and transcripts re sham affidavit	1.5
Silver, Thomas	02-23-24	Review CR 60(e) procedural issues for DF compliance – affirm failure to follow CR 60(e)(3) – research implications and case law re CR 60(e)(3)	1.0
Silver, Thomas	02-23-24	Emails with CC re CR 60 issues	0.2
Silver, Thomas	02-27-24	Review DF motion to show cause docs & decls; research case law – sham affidavits, Burnet, sophisticated businessman; begin drafting outline and response brief	8.5
Silver, Thomas	03-07-24	Conf/prep w/ CC re oral arguments	1.0
Silver, Thomas	03-07-24	Draft outline & strategy for CC oral argument	2.8
Silver, Thomas	03-08-24	Assist in oral argument prep	0.5
Silver, Thomas	03-08-24	Attend Silver hearing & hearing debrief	1.5
Silver, Thomas	03-13-24	Conf w/ CC re Silver order and strategy when DF objections received – entry of judgment on sanctions, work on objections, etc	1.0
Silver, Thomas	03-18-24	Conf with CC re anticipated discovery objections; Rudeen management of properties; motion strategy for status conference	0.5
Silver, Thomas	03-19-24	Conf w/ CC re Rudeen objections to class members – review Hager declaration and go through color categories – strategize brief response & plan doc review process	2.0
Silver, Thomas	03-21-24	Revise/edit Silver Report on Objections – conf w/ CC re Report	1.8
Silver, Thomas	03-26-24	Review email from DF re hearing on class objections	0.1
Silver, Thomas	03-28-24	Conf w/ CC re obtaining original spreadsheet doc from DFs & motion to seal response strategy	0.5
Silver, Thomas	03-28-24	Review DF Motion/Memo to Seal; Hager Decl; and docs provided under seal – verify law and citations	1.8
Silver, Thomas	03-28-24	Begin outlining & drafting response to DF Mot to Seal Hager Decl	2.5
Silver, Thomas	03-29-24	Draft response to Def Mot to Seal Hager Decl	3.7
Silver, Thomas	04-08-24	Review email from DF re hearing on class objections	0.1
Silver, Thomas	04-10-24	Review emails of DF & CT re class objections hearing & motions to seal	0.1
Silver, Thomas	04-10-24	Emails w/ CC re DF proposed May 13 hearing date on class objections issues and response timing	0.2
Silver, Thomas	04-25-24	Conf w/ CC re Silver scheduling motion & doc review	0.5

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Silver, Thomas	04-25-24	Edits on motion for scheduling order & email to CC re same	0.3
Silver, Thomas	04-30-24	Final drafting/edits to Response to Motion to Seal Hager Decl; draft proposed order re same	1.0
Silver, Thomas	04-30-24	Case meeting re strategy on 5/10 motion hearing responses – motions to seal (new one with Norton Decl); DF proposed order re class schedule; supplemental report issues on objections	1.0
Silver, Thomas	04-30-24	Review DF Motion & Memorandum to Seal Exhibit 2 of Norton Decl; review docs filed under seal; draft Response to Motion; draft proposed order re same	3.3
Silver, Thomas	04-30-24	Emails with staff re response motions & proposed orders	0.2
Silver, Thomas	05-02-24	Discuss supplemental report contents & strategy with CC	0.5
Silver, Thomas	05-03-24	Draft PF supplemental report re DF obj to class inclusion; draft Sutherland Decl & Hogue Decl re supplemental report	7.5
Silver, Thomas	05-09-24	Meet w/ CC re strategy for hearing argument on class inclusion objections	1.5
Silver, Thomas	05-09-24	Review pleadings/law re oral argument prep & begin draft outline	3.5
Silver, Thomas	05-10-24	Oral argument preparation	3.0
Silver, Thomas	05-10-24	Hearing re class inclusion objections	1.0
Silver, Thomas	05-24-24	Review/respond emails with CC re COA appealability brief	0.3
Silver, Thomas	05-29-24	Review issues for DF appeal "as matter of right" for COA letter/brief re appealability	0.5
Silver, Thomas	05-30-24	Review/edit brief to COA re appealability; case law research re RAPs; draft tables of authorities and contents	3.3
Silver, Thomas	05-30-24	Review/respond CC emails re memo on appealability	0.3
Silver, Thomas	06-07-24	Review CT order re class objections and annotate issues	0.5
Silver, Thomas	06-07-24	Conf w/ CC re motion for reconsideration – issues with CT order	1.0
Silver, Thomas	06-07-24	Call w/ court reporter re transcript of class objections hearing	0.1
Silver, Thomas	06-11-24	Review/respond to email from COA re argument on Silver appealability	0.1
Silver, Thomas	06-11-24	Email to court reporter re transcript	0.1
Silver, Thomas	06-12-24	Reviewing pleadings/legal research re COA appealability; drafting outline for COA hearing	3.5
Silver, Thomas	06-13-24	Prep oral argument for COA hearing on appealability	2.0
Silver, Thomas	06-13-24	COA hearing on appealability	0.5
Silver, Thomas	06-13-24	Debrief w/ CC re COA hearing	0.5
Silver, Thomas	06-14-24	Review emails from CC re spreadsheet	0.2
Silver, Thomas	06-14-24	Work on motion for reconsideration spreadsheet – reviewing for full deposit in timely manner compliance and compiling data	3.5

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Silver, Thomas	06-15-24	Emails w/ CC re spreadsheet of full deposit returns w/in timely manner	0.2
Silver, Thomas	06-17-24	Review/respond emails w/ CC re motion for reconsideration, declaration, and proposed order	0.6
Silver, Thomas	06-17-24	Review Sutherland Decl/attachments & proposed order re edits & make recommendations	1.0
Silver, Thomas	06-17-24	Phone call w/ CC re motion for reconsideration issues – strategy on options for court to choose from	0.3
Silver, Thomas	06-17-24	Review email from DF re Decl Norton Ex 2 from motion to seal denied	0.1
Silver, Thomas	06-17-24	Review Decl Norton Ex 2 version produced from motion to seal denial	0.2
Silver, Thomas	07-02-24	Review appellate court order re denial of appeal for Rudeen	0.2
Silver, Thomas	07-02-24	Emails w/ CC re appellate court decision	0.2
Silver, Thomas	07-09-24	Review/edit Reconsideration Reply re white category tenant exclusion	0.5
Silver, Thomas	07-17-24	Email w/ CT re motion to substitute class counsel hearing	0.1
Silver, Thomas	07-18-24	Draft motion to approve Hogue as class counsel; Decl Hogue re class counsel approval; proposed order re same	3.5
Silver, Thomas	07-18-24	Email w/ CC re motion for Hogue class counsel approval	0.1
Silver, Thomas	07-18-24	Conf w/ CC re Decl Sutherland contents on motion to approve Hogue as class counsel	0.3
Silver, Thomas	07-22-24	Edits to motion/decl re approval/substitution of Hogue as class counsel and email w/ CT	0.6
Silver, Thomas	07-22-24	Review email from CT & Order Granting PFs Motion to Approve & Substitute Class Counsel	0.1
Silver, Thomas	07-25-24	Email to OC re Order Granting PFs Motion to Approve & Substitute Class Counsel	0.1
Silver, Thomas	08-05-24	Review CT order re Reconsideration; conf w/ CC re next steps	0.5
Silver, Thomas	08-06-24	Conf w/ CC re case, mediation potential, & missing pet deposit issue from damage/security deposit list	0.5
Silver, Thomas	08-12-24	Review emails from OC re DF motion for clarification on CT reconsideration ruling	0.2
Silver, Thomas	08-12-24	Emails w/ CC re DF motion for clarification on CT reconsideration ruling – strategy and CR 16 conference potential	0.3
Silver, Thomas	08-12-24	Review DF motion for clarification on CT reconsideration ruling & proposed order – notes re issues	0.5
Silver, Thomas	08-13-24	Conf w/ CC re DF motion for clarification on CT reconsideration ruling	0.5
Silver, Thomas	08-15-24	Conf w/ CC re PF response on DF motion for clarification	0.3
Silver, Thomas	08-15-24	Review/edit PFs response re: DFs motion for clarification	0.5
Silver, Thomas	08-15-24	Review email from COA & mandate terminating review re DF appeal	0.2

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Silver, Thomas	08-15-24	Draft proposed order re DF motion for clarification; conf w/ CC re response; draft/edit updated PF response; emails w/ CC re PF response	3.2
Silver, Thomas	08-17-24	Review OC email re hearing on DF motion to clarify	0.1
Silver, Thomas	08-19-24	Review CT email re hearing on DF motion to clarify	0.1
Silver, Thomas	09-13-24	Review DF Reply on Motion for Clarification	0.2
Silver, Thomas	09-13-24	Emails w/ CC re DF Reply on Motion for Clarification	0.3
Silver, Thomas	09-16-24	Conf w/ CC re strategy for hearing on DF motion for clarification - & pet/other deposit issues	0.5
Silver, Thomas	09-19-24	Emails w/ CT re hearing on DF motion for clarification	0.2
Silver, Thomas	09-19-24	Review CT order re DF motion for clarification	0.1
Silver, Thomas	09-19-24	Conf w/ CC re Order on DF motion for clarification	0.2
Silver, Thomas	09-23-24	Call w/ CC re strategy – mediation discussions	0.2
Silver, Thomas	09-27-24	Conf w/ CC re DF motion for reconsideration on DF motion for clarification – strategy, motion to strike, & response	1.0
Silver, Thomas	09-27-24	Conf w/ CC re DF motion for reconsideration on DF motion for clarification	0.3
Silver, Thomas	09-30-24	Review DF briefing re motion for reconsideration on motion for clarification & annotate issues	0.5
Silver, Thomas	09-30-24	Comm w/ CLT re case status & response to DF motion	0.1
Silver, Thomas	09-30-24	Review PF motion to strike Rudeen motion for reconsideration, annotate issues, & email w/ CC re initial edits on draft response & strategy	0.9
Silver, Thomas	10-01-24	Review revised PF motion to strike Rudeen motion for reconsideration & make edits	0.5
Silver, Thomas	10-01-24	Emails w/ CC re PF motion to strike Rudeen motion for reconsideration	0.4
Silver, Thomas	10-17-24	Conf w/ CC re motion for reconsideration issues	0.2
Silver, Thomas	10-21-24	Review/respond to email from CC re PFs response to DFs new motion for reconsideration	0.2
Silver, Thomas	10-21-24	Conf w/ CC re PFs response to DFs new motion for reconsideration	0.2
Silver, Thomas	10-22-24	Review CC draft re PF response to DF motion for reconsideration on clarification order – make notes of further issues	0.6
Silver, Thomas	10-23-24	Edit/revise PF Response to DF motion for reconsideration on clarification order	1.0
Silver, Thomas	11-14-24	Review emails from OC and CC (BC) re sanctions issue	0.2
Silver, Thomas	11-21-24	Review time in case & create individual time sheet for fee petition on PFs Response to DFs mot recon on mot clarify	0.5
Silver, Thomas	11-21-24	Email to CC re Hogue time sheet	0.1
Silver, Thomas	12-02-24	Emails w/ CC re DFs packets for objections to class members	0.3
Silver, Thomas	12-02-24	Conf w/ CC re DFs objection to attorneys' fees petition	0.5

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CLIENT	DATE	ACTIVITY	TIME
Silver, Thomas	12-03-24	Review Durkop discovery production re verification of class members & nonrefundable pet deposits; review lease agreements for nonrefundable fee issue	3.9
Silver, Thomas	12-03-24	Conf w/ CC (SS) re Sutherland review of discovery info findings	0.5
Silver, Thomas	12-03-24	Emails w/ CC re Rudeen properties	0.8
Silver, Thomas	12-11-24	Conf w/ CC (SS) re strategy on Silver exclusions issues on lack of production of leases	0.4
Silver, Thomas	12-11-24	Draft email to OC re DFs objections & lack of documentary evidence re leases and condition checklists & lack of native Excel spreadsheet re class info	0.4
Silver, Thomas	12-22-24	Emails w/ CC re declarations for PFs reply brief re atty fee sanction	0.3
Silver, Thomas	12-23-24	Review PF reply re atty fee sanction & make final edits	0.8
Silver, Thomas	12-23-24	Review/respond emails w/ CC re PFs reply brief re atty fee sanction and revisions	0.2
Silver, Thomas	01-13-25	Call w/ CC (SS) re class scheduling strategy, mediation potential & numbers – review DF Excel sheet re tenants & deposit numbers and discuss mediation/settlement strategy	1.1
Silver, Thomas	01-14-25	Conf w/ CC (BC & SS) re class administration scheduling order deadlines & order/motion contents	1.0
Silver, Thomas	01-14-25	Work w/ CC (SS) re class administration order contents	0.4
Silver, Thomas	01-15-25	Call w/ CC (BC) re scheduling order issues & mediation	0.5
Silver, Thomas	01-22-25	Email to CT re PFs motion for class administration scheduling order hearing	0.1
Silver, Thomas	01-22-25	Email to OC re hearing date on class administration scheduling order	0.1
Silver, Thomas	01-22-25	Review/respond emails w/ CC re class administration scheduling order strategy & potential DF stipulation re order	0.2
Silver, Thomas	02-04-25	Call w/ CC re mediation letter & DF lease production	0.2
Silver, Thomas	02-05-25	Draft letter to DF re production of leases & mediation	0.8
Silver, Thomas	02-05-25	Emails w/ CC re letter to DF on leases & mediation	0.2
Silver, Thomas	02-05-25	Email to OC re letter to DF on leases & mediation	0.1
Silver, Thomas	02-05-25	Conf w/ CC re DFs proposed protective order re written leases	0.5
Silver, Thomas	02-05-25	Msg to CC re class notice issues	0.1
Silver, Thomas	02-10-25	Email CT re call ready PFs motion for class admin order	0.1
Silver, Thomas	02-11-25	Conf w/ CC (BC) re reply on PFs Motion for Class Admin Scheduling Order & response to DFs request for protective order on lease agreements	0.6
Silver, Thomas	02-11-25	Review DFs proposed protective order re lease agreements & note issues	0.3
Silver, Thomas	02-11-25	Email to OC re DFs proposed protective order re lease agreements	0.7

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Silver, Thomas	02-11-25	Conf w/ CC – review DF response on motion for class admin & discuss Reply brief issues, strategy, and outline for substantive issues on reply	0.7
Silver, Thomas	02-12-25	Review/respond mail w/ CC re proposed order on PFs Mot Class Admin Order	0.1
Silver, Thomas	02-12-25	Draft Hogue declaration w/ exhibits re PFs Reply on PFs motion for class admin scheduling order & edit PFs Reply brief	2.6
Silver, Thomas	02-12-25	Email to OC re PFs Reply on PFs motion for class admin scheduling order	0.1
Silver, Thomas	02-12-25	Respond to OC email re hearing availability of DFs proposed motion for decertification	0.1
Silver, Thomas	02-14-25	Prep for hearing on PFs motion for scheduling order	1.0
Silver, Thomas	02-14-25	Hearing on PFs motion for class admin scheduling order	0.9
Silver, Thomas	02-14-25	Debrief w/ CC re hearing on PFs motion for class admin scheduling order	0.8
Silver, Thomas	02-26-25	Legal research re W.D. Wash. Richmond case; review Pacer re complaint and amended complaints re causes of action; verify .280 and .060 causes of action issues	2.4
Silver, Thomas	02-27-25	Review voicemail from OC	0.1
Silver, Thomas	02-27-25	Conf w/ CC re mediation and lease agreement issues	0.3
Silver, Thomas	02-27-25	Call w/ OC re mediation	0.1
Silver, Thomas	02-27-25	Conf w/ CC re response strategy to DF motion decertification	1.0
Silver, Thomas	02-27-25	Legal research re CR 11 and intransigence; draft sanctions portion of Response to DFs motion for decertification	3.7
Silver, Thomas	03-03-25	Emails w/ CC re Rudeen lease production	0.2
Silver, Thomas	03-04-25	Conf w/ CC re hearing issues on DF motion for decertification	0.5
Silver, Thomas	03-04-25	Review emails from OC & CT re DFs motion for decertification	0.2
Silver, Thomas	03-05-25	Review email from OC re DFs reply on DFs motion for decertification	0.1
Silver, Thomas	03-06-25	Review email from CT re DFs service	0.1
Silver, Thomas	03-07-25	Prep hearing/draft outline/review briefing materials re DFs motion to modify class/decertification	2.2
Silver, Thomas	03-07-25	Hearing re DFs motion to modify class/decertification	0.8
Silver, Thomas	03-07-25	Debrief w/ CC re DFs motion to modify class/decertification	0.5
Silver, Thomas	03-10-25	Email to CT re court reporter inquiry	0.1
Silver, Thomas	03-10-25	Emails w/ CC re fee petition from CT ruling	0.3
Silver, Thomas	03-10-25	Conf w/ CC re fee petition and mediation	0.5
Silver, Thomas	03-13-25	Begin draft of PFs response to DFs objections to class member inclusion; begin draft Hogue Decl	6.9
Silver, Thomas	03-13-25	Email to CC re PFs response to DFs objections	0.2

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Silver, Thomas	03-14-25	Finalize draft of PFs response to DFs objections to class member inclusion and Hogue Decl w/ exhibits	5.2
Silver, Thomas	03-14-25	Email to OC re PFs response to DFs objections to class member inclusion	0.1
Silver, Thomas	03-15-25	Msgs to CC re issues to clarify re PFs response to DFs objections to class member inclusion	0.2
Silver, Thomas	03-16-25	Msgs w/ CC re issues to clarify re PFs response to DFs objections to class member inclusion	0.2
Silver, Thomas	03-16-25	Email to CT reporter re transcript	0.1
Silver, Thomas	03-19-25	Draft order denying DFs motion to decertify and modify	0.4
Silver, Thomas	03-19-25	Email to OC re order denying DFs motion to decertify	0.1
Silver, Thomas	03-20-25	Review/respond email from OC re order denying DFs motion to decertify class	0.1
Silver, Thomas	03-20-25	Review DFs changes to order denying DFs motion to decertify class	0.1
Silver, Thomas	03-20-25	Edit order denying DFs motion to decertify class	0.1
Silver, Thomas	03-20-25	Email to OC re edits on order denying DFs motion to decertify class	0.1
Silver, Thomas	03-20-25	Review email from OC approving order denying DFs motion to decertify class	0.1
Silver, Thomas	03-24-25	Draft notice of correction re PFs response to DFs objections to class inclusion w/ review of docs	0.8
Silver, Thomas	03-28-25	Call w/ CC re DFs request for PFs atty time records for sanctions stipulation	0.2
Silver, Thomas	03-28-25	Review/respond to OC email re stipulation on sanctions – time records	0.2
Silver, Thomas	03-28-25	Review/respond email from OC re DF sanctions stipulation	0.1
Silver, Thomas	03-28-25	Draft stipulated order re sanctions on Rudeen for intransigence	0.2
Silver, Thomas	03-28-25	Email to CC re stipulated order re sanctions on DF for intransigence	0.1
Silver, Thomas	04-01-25	Review/respond email from OC re edits to order on Rudeen sanctions	0.1
Silver, Thomas	04-01-25	Edit order re DF sanctions	0.2
Silver, Thomas	04-01-25	Review email from OC & signed sanctions order	0.1
Silver, Thomas	04-25-25	Review/edit class notices; research re case law on CT approval re notices	3.2
Silver, Thomas	04-25-25	Email to class administrator EAG re OC introduction and class member information needed	0.2
Silver, Thomas	04-25-25	Review/respond to OC email re class admin contact info	0.1
Silver, Thomas	04-25-25	Review OC email & DF proposed order re class notice	0.1
Silver, Thomas	05-02-25	Draft CR 16 motion; review case filings; review CR 16	1.2
Silver, Thomas	05-05-25	Review letter from CT re PFs response deadline to DFs motion for discretionary review; review RAPs & email CT re issues	0.4

ATTY: Attorney
CC: Co-Counsel
CLT: Client

CT: Court
DF: Defendant
PF: Plaintiff

OC: Opposing Counsel (and/or staff)
Conf: Conference

CLIENT	DATE	ACTIVITY	TIME
Silver, Thomas	05-05-25	Review emails from class admin & OC re cost estimate; & review cost estimate	0.3
Silver, Thomas	05-12-25	Review/respond to class administrator email re notice	0.1
Silver, Thomas	05-12-25	Review email from class administrator	0.1
Silver, Thomas	05-12-25	Draft/file motion for extension of time to file answer to DF motion for discretionary review w/ review of file & CT correspondence	0.5
Silver, Thomas	05-14-25	Review CT ruling re appeal brief extension & email staff re same	0.1
Silver, Thomas	05-15-25	Review email from CT re judge requested docs & strike CR 16 hearing	0.1
Silver, Thomas	05-15-25	Review sub number docs requested by CT	0.4
Silver, Thomas	05-15-25	Email to CT re production of judge requested docs	0.1
Silver, Thomas	05-16-25	Review CT order re Rudeen compliance w/ exclusion list	0.1
Silver, Thomas	05-29-25	Silver discretionary review response drafting; draft/add facts to procedural posture; draft & legal research re RAP 2.3(b)(3) standard; draft section re DF failing to meet appeal standard; draft/add to section re DF appeal fundamentally flawed	6.7
Silver, Thomas	05-30-25	Finalize drafting Silver discretionary review response; draft section re intransigence sanctions w/ legal research; draft RAP 18.9 section w/ legal research; organize docs re appendix; draft table of contents and authorities	7.7
Silver, Thomas	06-23-25	Review/respond email from appellate court re discretionary review hearing	0.1
Silver, Thomas	06-25-25	Review appellate materials and draft outline for appellate hearing	3.3
Silver, Thomas	06-26-25	Prep appellate hearing	2.2
Silver, Thomas	06-26-25	Appellate hearing re DFs motion for discretionary review	0.6
Silver, Thomas	06-26-25	Appellate hearing debrief w/ CC	0.4
Silver, Thomas	06-30-25	Draft response re DFs Class Objection list	3.8
Silver, Thomas	07-17-25	Review DFs Reply re Class Objection list & supporting decl; review discrepancies/annotate issues	2.9
Silver, Thomas	10-01-25	Review appellate CT order denying DFs 2nd motion for discretionary review	0.2
Silver, Thomas	10-01-25	Conf w/ CC re appellate CT order & litigation strategy	0.4
Silver, Thomas	10-03-25	Draft motion for scheduling order and proposed order re same; research re class objections and atty fee issues with class trial/judgment versus settlement	3.3
Silver, Thomas	10-10-25	Review law re class notice due process requirements	0.7
Silver, Thomas	10-10-25	Hearing re class scheduling order	0.7
Silver, Thomas	10-10-25	Conf w/ CC re class notice issues	0.5
Silver, Thomas	12-02-25	Email to OC re settlement issues	0.1
Silver, Thomas	12-02-25	Review email from OC re settlement issues	0.1
Silver, Thomas	12-02-25	Conf w/ staff re verifying class members	0.2

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CLIENT	DATE	ACTIVITY	TIME
Silver, Thomas	12-03-25	Email to OC re class notice & mediation	0.2
Silver, Thomas	12-03-25	Call w/ CC re class notice & mediation issues	0.2
Silver, Thomas	12-04-25	Emails w/ OC re mediation	0.4
Silver, Thomas	12-04-25	Conf w/ CC re mediation & case strategy	1.0
Silver, Thomas	12-05-25	Call w/ mediator	0.1
Silver, Thomas	12-05-25	Email to OC re mediation issues	0.1
Silver, Thomas	12-05-25	Email to mediator w/ all counsel	0.2
Silver, Thomas	12-06-25	Review & verify class member list re deposit amounts for 7,000+ tenants; calculate prejudgment interest for each; flag deposit discrepancies; & compile judgment data	8.2
Silver, Thomas	12-06-25	Email to CC re class member deposit data	0.7
Silver, Thomas	12-11-25	Review email from class administrator & respond re notice issues & case documents	0.3
Silver, Thomas	12-12-25	Begin draft of mediation letter	2.4
Silver, Thomas	12-12-25	Conf w/ CC re Silver mediation strategy & DFs mediation letter, settlement offer, and exhibits	1.0
Silver, Thomas	12-13-25	Finalize mediation letter w/ exhibits	3.5
Silver, Thomas	12-15-25	Call w/ OC re class period issue on class notices	0.1
Silver, Thomas	12-15-25	Emails w/ class administrator and OC re notice and script issues	0.3
Silver, Thomas	12-15-25	Review class notice and script drafts from administrator and make edits	0.6
Silver, Thomas	12-17-25	Mediation	10.0
Silver, Thomas	12-18-25	Draft stipulated motion/order re case scheduling order & email to OC	0.3
Silver, Thomas	01-26-26	Drafting long form class notice re settlement	4.8
Silver, Thomas	01-27-26	Finalize drafting long form class notice re settlement	1.2
Silver, Thomas	02-02-26	Final edits for first draft of long form class notice	1.4
Silver, Thomas	02-02-26	Emails w/ CC re long form notice	0.2
Silver, Thomas	02-03-26	Drafting short form class notice	1.0
Silver, Thomas	02-04-26	Drafting/finalizing notices, settlement agreement, orders, etc re class settlement & preliminary approval	4.4
Silver, Thomas	02-17-26	Email to OC re preliminary approval docs	0.1
Silver, Thomas	02-20-26	Reviewing settlement docs for additional revisions	1.0
Silver, Thomas	02-20-26	Email w/ CT re final approval	0.1
Silver, Thomas	02-23-26	Review/sign settlement	0.1
Silver, Thomas	02-23-26	Conf w/ CC re remaining issues	0.3
Silver, Thomas	02-26-26	Final review of preliminary approval docs & minor edits	1.2
Silver, Thomas	02-26-26	Review/respond to OC email re preliminary approval filing	0.1
Silver, Thomas	03-03-26	Review CT order re preliminary approval	0.1

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CT: Court
DF: Defendant
PF: Plaintiff

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CLIENT	DATE	ACTIVITY	TIME	
Silver, Thomas	03-03-26	Emails w/ class administrator re notice and administration	0.5	
Silver, Thomas	03-18-26	Review emails from class admin re notices & OC re approval	0.2	
Silver, Thomas	03-19-26	Review class notice docs & email to class admin	0.7	
Silver, Thomas	03-25-26	Review settlement website & review/respond admin email re requested edits	0.7	
Silver, Thomas	03-26-26	Review emails from OC & settlement administrator re website	0.2	
Silver, Thomas	03-31-26	Review/respond OC email w/ CT re motion to vacate sanctions order	0.1	
Silver, Thomas	03-31-26	Reviewing motion for atty fees re settlement re edits	0.4	
Silver, Thomas	04-01-26	Drafting Hogue Decl w/ exhibit; emails w/ CC re motion for atty fees; final brief review	2.3	
TOTAL:			236.4	RATE: \$625
Total Fees:				\$147,750.00

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CLT: Client

CT: Court
DF: Defendant
PF: Plaintiff

OC: Opposing Counsel (and/or staff)
Conf: Conference

FILED

2026 APR -1 P 4: 22

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR SPOKANE COUNTY

THOMAS SILVER, an individual, and all those
similarly situated

Plaintiff,

vs.

RUDEEN MANAGEMENT COMPANY,
INC., a Washington corporation,

Defendant.

NO. 17-2-03130-32

DECLARATION OF KAMMI MENCKE
SMITH IN SUPPORT OF KIRK MILLER
(DECEASED) FEE AND EXPENSE
APPLICATION

I, Kammi Mencke Smith, being over the age of 18, submit this declaration in support of Plaintiff
Counsel's Fee and Expense Application.

1. I have been hired by Kirk D. Miller Law PLLC to help with employment issues following Kirk Miller's unfortunate and untimely death in December 2023. One of the issues I have been hired to help with is the sharing of fees on certain cases with other counsel.
2. I graduated from Gonzaga School of Law Cum Laude in December 2003 after just 2.5 years of law school.

DECLARATION OF KAMMI MENCKE
SMITH IN SUPPORT OF PLAINTIFF
COUNSEL'S FEE AND EXPENSE
APPLICATION - 1

WBM | WITHERSPOON
BRAJICICH
MCPHEE

A PROFESSIONAL LIMITED
LIABILITY COMPANY

601 West Main Avenue, Suite
1400
Spokane, Washington 99201-
0677
Telephone: (509) 455-9077
Fax: (509) 624-6441

- 1- 3. I was a legal intern during law school at Winston & Cashatt Lawyers and became
 2 immediately employed by Winton & Cashatt following my bar exam passage. In June
 3 2023, I moved my practice to Witherspoon Brajcich McPhee PLLC.
 4
 5- 4. During my 21 years of law practice, I have primarily focused on employment law,
 6 representing both plaintiffs and defendants.
 7
 8 5. I am a member in good standing of the following courts:

COURT	DATE OF ADMISSION
Washington State Bar (No. 34911)	5/26/2004
Idaho State Bar (No. 7834)	9/27/2007
United States District Court – Eastern District of Washington	8/5/2004
United States District Court – Western District of Washington	11/4/2019
United States Court of Appeals – Ninth Circuit	1/15/2009

18
 19 6. I have spent 20+ hours (pro bono) looking through billing records, emails, pleadings and
 20 other parts of the Kirk Miller Law, PLLC’s file to verify that the accuracy of the billing
 21 records.
 22

23 7. From this review, I have determined the following:

- 24 a. Mr. Miller billed \$400 per hour until 2023, and \$650 per hour starting in 2023;
 25
 26 b. Mr. Miller billed his paralegal at \$125 per hour at all times;
 27
 28 c. Billed paralegal time was for legal work and not work that is secretarial in

29 nature;

30 DECLARATION OF KAMMI MENCKE
 31 SMITH IN SUPPORT OF PLAINTIFF
 32 COUNSEL’S FEE AND EXPENSE
 APPLICATION - 2

WBM | WITHERSPOON
 BRAJCICH
 MCPHEE
 A PROFESSIONAL LIMITED
 LIABILITY COMPANY
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 1400
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 0677
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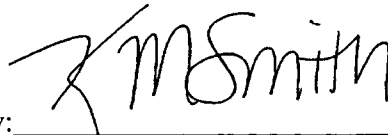
- d. Mr. Miller spent 159.1 hours on this matter from 2019 through 2022;
- e. Mr. Miller spent 82.2 hours on this matter in 2023;
- f. Mr. Millers experienced paralegal spent 18.2 hours on legal tasks such as drafting briefs and civil rule research.

8. Therefore, Kirk D. Miller PLLC spent the following resources on this matter:

Kirk Miller time 2019-2022	159.1 hours	\$63,640.00
Kirk Miller time 2023	82.2 hours	\$53,436.00
Paralegal time	18.2 hours	\$2,275.00
Hard Costs – service fee, jury fee, transcript fee, and fees to the appellant courts		\$451.57

Dated this 25 day of March 2026

WITHERSPOON BRAJCICH MCPHEE, PLLC



By: _____
Kammi M. Smith, WSBA #34911

DECLARATION OF KAMMI MENCKE
SMITH IN SUPPORT OF PLAINTIFF
COUNSEL'S FEE AND EXPENSE
APPLICATION - 3

WBM | WITHERSPOON
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MCPHEE
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served by the method indicated below to the following this ___ day of March, 2026.

DECLARATION OF KAMMI MENCKE
SMITH IN SUPPORT OF PLAINTIFF
COUNSEL'S FEE AND EXPENSE
APPLICATION - 4

WBM | WITHERSPOON
BRAJICICH
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601 West Main Avenue, Suite
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Spokane, Washington 99201-
0677
Telephone: (509) 455-9077
Fax: (509) 624-6441

1 **CERTIFICATE OF SERVICE**

2 I hereby declare upon penalty of perjury under the laws of the state of Washington that on
3 the date stated below I served a copy of this document in the manner indicated:

4 PISKEL YAHNE KOVARIK, PLLC
5 612 W. Main Ave., Ste. 207
6 Spokane, WA 99201
7 Attn:
8 Ryan D. Yahne
9 Whitney Norton
10 William Emmal

First Class U.S. Mail
X E-Mail:
wnorton@pyklawyers.com;
wemmal@pyklawyers.com;
ryahne@pyklawyers.com
 Hand Delivery
 Next Day Air

11 DATED this 1st day of April 2026.

12 *s/ Bonnie Morey*
13 Bonnie Morey, Legal Assistant

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24 Cameron Sutherland, PLLC
25 827 W. 1st Ave., Ste 301
Spokane, WA 99201
Tel: (509) 315-4507

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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE**

<p>THOMAS SILVER, an individual, and all those similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>RUDEEN MANAGEMENT COMPANY, INC., a Washington corporation,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No.: 17-2-03103-2</p> <p>DECLARATION OF SHAYNE J. SUTHERLAND IN SUPPORT OF UNOPPOSED MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS, AND SERVICE AWARD</p>
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Shayne J. Sutherland declares the following upon penalty of perjury, as provided for and by the laws of the state of Washington:

1. I am counsel of record for Plaintiff Thomas Silver and the class in this matter. I am of legal age and am competent to testify to and have personal knowledge of the matters set forth herein.
2. I graduated from Gonzaga University School of Law with honors in 2011.
3. I am a member in good standing admitted to practice by the bars of Washington State and the United States District Court for the Eastern District of Washington.

1 4. I am an owner and managing partner at the law firm of Cameron Sutherland,
2 PLLC, which has operated since 2012.

3 5. The majority of my practice involves representing lower-income and
4 economically distressed individuals. The majority of my fees are earned on a contingency basis
5 under fee-shifting statutory provisions.
6

7 6. My firm's entire attorney fees in this matter were contingent upon the outcome.
8 As such, if Mr. Silver did not prevail, or this matter did not settle, my firm would have put forth
9 nearly a thousand hours of work and received no payment.

10 7. I am a recognized authority in consumer protection and landlord-tenant practice
11 and have presented at multiple educational seminars to community organizations and attorneys
12 concerning consumer and landlord-tenant law.
13

14 8. I volunteer several weeks a year with the Inland Empire Legal Aid Program
15 (formerly known as the Spokane County Bar Association Volunteer Lawyers Consumer
16 Assistance Program) assisting and/or representing low-income individuals who appear in court
17 with consumer and debt collection defense issues.

18 9. I have previously been determined to be adequate class counsel in several actions
19 in the Washington State Courts and the United States District Court for Eastern Washington.
20 These matters include but are not limited to: *Daley v. Avenue5 Residential, LLC*, Spokane
21 Superior Court Cause No. 19-2-04154-32; *Miller v. Guenther Management, LLC*, Spokane
22 Superior Court Cause No. 20-2-02604-32; *Rainer v. Moland Management Company, Inc.*,
23 Spokane Superior Court Cause No. 20-2-03360-32; *Silver v. Rudeen Mgmt. Co., Inc.*, Spokane
24 Superior Court Cause No. 17-2-03103-2; *Morris v. FPI Management*, US District Court for the
25 Eastern District of Washington, Cause No. 2:19-CV-0128-TOR; *Dirk v. RC Schwartz &*

1 *Associates, Inc.*, Spokane Superior Court Cause No. 23-2-03085-32; and *Schultz v. Avenue5*
2 *Residential, LLC*, US District Court for the Eastern District of Washington, Cause No. 2:23-CV-
3 00088-SAB. All of those matters concerned tenant-side causes of action like the one here. My
4 co-counsel Brian Cameron and Christopher Hogue have also been deemed adequate class
5 counsel in numerous matters before the state and federal courts of Washington.
6

7 10. My firm has presented landlord-tenant matters of first impression to the
8 Washington Court of Appeals on multiple occasions, in cases such as *Goodeill v. Madison Real*
9 *Est.*, 191 Wn. App. 88 (2015) and *Lewis v. Zanco*, 16 Wn. App. 2d 819 (2021), as well as to the
10 Washington Supreme Court in the matter of *Silver v. Rudeen Mgmt. Co., Inc.*, 197 Wn.2d 535,
11 538 (2021).
12

13 11. My current contingent hourly rate for class action work is six hundred seventy-
14 five dollars (\$675) per hour. Last year the Spokane County Superior Court approved my and Mr.
15 Cameron's class action contingency rate of six hundred twenty-five dollars (\$625) per hour in
16 the matter of *Dirk v. RC Schwartz & Associates, Inc.*, SCSC No. 23-2-03085-32 at SNs 29, 38.
17 Before his passing in 2023, my former co-counsel Mr. Miller's class action contingency rate was
18 \$650.
19

20 12. Class action litigation is complex and often highly contested. As a plaintiff's
21 attorney in these types of actions my firm is often pitted against some of the largest and most
22 successful defense firms in the state of Washington and other states. Many of these actions
23 require hundreds or thousands of hours of attorney time. If they are unsuccessful, as some of my
24 plaintiff client class action cases have been in the past, they result in no payment or greatly
25 reduced payment of attorneys' fees and no recovery of costs.

1 13. I have investigated and am familiar with the rates charged by attorneys practicing
2 in Spokane, Washington and throughout Washington. A class action contingent rate of \$675 per
3 hour for a firm principal and attorney with my qualifications and experience is within the market
4 rate for this area. Rates of \$600-\$750, for plaintiff class actions attorneys with similar or less
5 experience than myself and co-counsel are routinely awarded. I am aware of class action plaintiff
6 firms that have been awarded \$1,180 per hour for partners, and \$710 per hour for associate
7 attorneys with several less years of experience in Washington. I am aware of another attorney
8 who litigates in this district and charges his corporate clients a *non-contingent rate* of \$745 per
9 hour or more to defend class actions.
10

11 14. My firm, Cameron Sutherland, PLLC, has expended more than 1000 hours on
12 legal services directly related to this case, including case analysis, research, discovery, contested
13 motion practice, and settlement negotiations. A true and correct copy of my contemporaneous
14 time records reflecting my representation of this matter is attached hereto as **Exhibit A**.
15

16 15. A reasonable rate for my paralegal and legal assistant staff is \$195.00 per hour
17 and \$125.00 per hour for litigation support staff. I have investigated and am familiar with hourly
18 rates charged for paralegals and legal assistants in this region and my firm's rate is at or below
19 the market rate for such services. My firm's legal staff has accrued over 225 hours or
20 approximately \$43,875 in billable time in this matter. Mr. Miller's paralegal spent 18.2 hours for
21 a total of \$2,275.00.
22

23 16. My firm incurred \$2,456.25 in direct litigation costs related to this litigation
24 (multiple transcript and filing fees, and a mediation fee). If Mr. Silver were unsuccessful in this
25 matter, those costs would not have been returned. My former co-counsel Kirk D. Miller incurred

1 \$451.57 in hard costs. A total of \$2,907.82 in costs is requested for all co-counsel and will be
2 distributed to the firms that paid them if approved.

3 17. I anticipate my firm spending an additional 30 plus hours assisting with class
4 administration and preparing necessary pleadings and arguments regarding Plaintiff's Motion for
5 Final Approval.
6

7 18. Based upon the 538 total hours I have already expended representing this matter,
8 Mr. Cameron's time of at least 464 hours, Mr. Hogue's time of 236 hours, and Mr. Miller's time
9 of approximately 241 hours, at least 1479 attorney hours have been expended to represent this
10 matter to date. With anticipated time of over 30 hours still needed to bring this case to a
11 conclusion, the total attorney time in this matter is expected to exceed 1509 hours. At rates of
12 \$600-\$675 the lodestar attorney's fees would be \$887,400-\$998,325. With staff time amounting
13 to over \$46,000, no multiplier or a multiplier of only~1.04 would be needed to reach the
14 uncontested \$966,667 attorney's fees award request.
15

16 19. Mr. Silver provided substantial services in this matter, including, but not limited
17 to, assisting his counsel in investigating and confirming the Defendants' practices in this matter,
18 drafting the complaint, participating in motion practice, analyzing and reviewing documents to
19 ascertain a reasonable range of damages, and participating extensively in the settlement achieved
20 for the class including an all-day mediation. Mr. Silver was faced with personal financial ruin in
21 this case, as the trial court originally assessed over \$15,000 in Rudeen's attorneys' fees and costs
22 when it erroneously dismissed this case several years ago. Thereafter, he faced even greater
23 economic disaster as Division III erroneously agreed with that court's decision. Thankfully, the
24 Washington Supreme Court agreed to take his discretionary review and overturned those
25 decisions. Mr. Silver should be compensated for his efforts and risk taken to secure an excellent

1 settlement for the class in this matter. Mr. Silver requests a combined damages and class
2 representative service award of \$20,000.00, which Rudeen agreed to pay and not contest.

3 RESPECTFULLY SIGNED this 1st day of April 2026 at SPOKANE, WA.
4

5
6 s/ Shayne J. Sutherland
7 Shayne J. Sutherland, WSBA #44593
8 *Attorney for Plaintiff and Class*
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1 **CERTIFICATE OF SERVICE**

2 I hereby declare upon penalty of perjury under the laws of the state of Washington that on
3 the date stated below I served a copy of this document in the manner indicated:

4 PISKEL YAHNE KOVARIK, PLLC
5 612 W. Main Ave., Ste. 207
6 Spokane, WA 99201
7 Attn:
8 Ryan D. Yahne
9 Whitney Norton
10 William Emmal

First Class U.S. Mail
X E-Mail:
wnorton@pyklawyers.com;
wemmal@pyklawyers.com;
ryahne@pyklawyers.com
 Hand Delivery
 Next Day Air

11 DATED this 1st day of April 2026.

12 s/ Bonnie Morey
13 Bonnie Morey, Legal Assistant

EXHIBIT A

CAMERON SUTHERLAND, PLLC

827 W. 1st Ave., Ste. 301
Spokane, WA 99201

CONTEMPORANEOUS TIMESHEET

Silver, Thomas v. Rudeen Management

Shayne J. Sutherland

CLIENT	DATE	ACTIVITY	TIME	RATE	Total	TYPE
Silver, Thomas	1/9/2019	Rvw: Clerk's papers; Drft: edits to Clerk's papers; Conf: with staff conc. CP and road forward	0.9	675.00	607.50	Contingent
Silver, Thomas	3/8/2019	Rvw: Appellate Reply; Conf: with CC conc. Draft	0.4	675.00	270.00	Contingent
Silver, Thomas	10/21/2019	Rvw: Appellate recon brief; Final typo review with TB	0.5	675.00	337.50	Contingent
Silver, Thomas	4/1/2020	Rvw: Order from SC conc. Potential review; conf: with CC conc. Case	0.3	675.00	202.50	Contingent
Silver, Thomas	4/27/2020	Rvw: OC response to Petition for review; Rsch: verify case cites	1.1	675.00	742.50	Contingent
Silver, Thomas	5/1/2020	Rvw: Order from SC accepting review; Conf: with CC conc. Review	0.9	675.00	607.50	Contingent
Silver, Thomas	5/8/2020	Conf: with CC conc. Case; with Col. Legal Svcs conc. Amicus	1.7	675.00	1147.50	Contingent
Silver, Thomas	7/8/2020	Conf with CLS conc. Amicus briefing	0.4	675.00	270.00	Contingent
Silver, Thomas	9/4/2020	Rvw: Amicus from Terrell Marshall	0.5	675.00	337.50	Contingent
Silver, Thomas	10/14/2020	Rsch: Rvw Appellate briefing materials; case law on SOL	7.1	675.00	4792.50	Contingent
Silver, Thomas	10/15/2020	Conf: with CC conc. SC arguments	6.5	675.00	4387.50	Contingent
Silver, Thomas	10/19/2020	Conf: Meeting with CC conc. Supreme Court arguments and preparation	1.2	675.00	810.00	Contingent
Silver, Thomas	10/20/2020	Lit: Attend Supreme Court Hearing (1.0); Conf: With CC discussing hearing (0.3)	1.3	675.00	877.50	Contingent
Silver, Thomas	4/22/2021	Rvw: Opinion of SC (0.5); Conf: With CC disc. Case and opinion (0.9); Comm: with CL conc. ruling (0.3)	1.7	675.00	1147.50	Contingent
Silver, Thomas	5/25/2021	Conf: with CC and staff conc. Case, JSR	0.3	675.00	202.50	Contingent
Silver, Thomas	5/26/2021	Conf: with CC and staff conc. Trial dates	0.2	675.00	135.00	Contingent
Silver, Thomas	5/27/2021	Rvw: Correspondence from court	0.1	675.00	67.50	Contingent
Silver, Thomas	6/2/2021	Drft: Discovery	6.8	675.00	4590.00	Contingent
Silver, Thomas	6/3/2021	Drft: Discovery	4.5	675.00	3037.50	Contingent
Silver, Thomas	6/4/2021	Drft: Finish drafts of discovery	7.4	675.00	4995.00	Contingent
Silver, Thomas	6/25/2021	Rvw: BC edits to discovery; Drft: edits to discovery	2.1	675.00	1417.50	Contingent
Silver, Thomas	6/29/2021	Com: with CC conc. Serving of discovery	0.1	675.00	67.50	Contingent
Silver, Thomas	8/3/2021	Conf: with CC conc. Outstanding discovery responses	0.3	675.00	202.50	Contingent
Silver, Thomas	8/18/2021	Rsch: Goodeil req's in response to OC's potential contract argument (1.3); Conf. with CC disc. contractual obligations argument (0.7)	2	675.00	1350.00	Contingent

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Silver, Thomas	10/11/2021	Rvw: corres. From OC conc. Discovery; Conf: with CC conc. Strategy and motions	1.2	675.00	810.00	Contingent
Silver, Thomas	10/28/2021	Rvw and Edit Motion dec to continue trial	0.3	675.00	202.50	Contingent
Silver, Thomas	7/7/2022	Comm: with OC conc. 26(i); Conf: with CC conc. Outstanding discovery	0.4	675.00	270.00	Contingent
Silver, Thomas	7/25/2022	Rvw and edit pleadings to cont. trial	0.2	675.00	135.00	Contingent
Silver, Thomas	1/6/2023	Lit: prep for hearing; Drft: stipulated pleadings	0.8	675.00	540.00	Contingent
Silver, Thomas	4/7/2023	Drft: edits to compel compliance; Conf: with BC conc. Motion	1.2	675.00	810.00	Contingent
Silver, Thomas	4/19/2023	Conf: with TB and CC conc. Class cert	0.7	675.00	472.50	Contingent
Silver, Thomas	4/20/2023	Drft: Class Cert docs; Rvw: file history	4.6	675.00	3105.00	Contingent
Silver, Thomas	4/28/2023	Rvw: Discovery answers and prior pleadings	2.8	675.00	1890.00	Contingent
Silver, Thomas	5/1/2023	Rvw: Case history (0.9); Drft: motion for class cert (3.2)	4.1	675.00	2767.50	Contingent
Silver, Thomas	5/2/2023	Drft: Memo and other pleadings in support of class cert	7.1	675.00	4792.50	Contingent
Silver, Thomas	5/3/2023	Drft: Class cert memo; dec.	4.1	675.00	2767.50	Contingent
Silver, Thomas	5/17/2023	Drft: proposed order Class Cert; Replies compel compliance and class cert	1.7	675.00	1147.50	Contingent
Silver, Thomas	5/19/2023	Lit: Prep for and attend hearing	4.2	675.00	2835.00	Contingent
Silver, Thomas	5/24/2023	Conf: with CC conc. motions	0.4	675.00	270.00	Contingent
Silver, Thomas	5/25/2023	Drft: Mt. and dec for atty fees	3.9	675.00	2632.50	Contingent
Silver, Thomas	6/6/2023	Drft: Reply; Rsch: case law on necessary party, default, non-responsive discovery	4.1	675.00	2767.50	Contingent
Silver, Thomas	6/7/2023	Drft: Reply re class cert	3.8	675.00	2565.00	Contingent
Silver, Thomas	6/7/2023	Rvw: Discovery docs	3.1	675.00	2092.50	Contingent
Silver, Thomas	6/9/2023	Lit: prep for and attend hearing on class cert	3.8	675.00	2565.00	Contingent
Silver, Thomas	6/30/2023	Drft: Rvw and edit motion for default; Conf: with CC disc. motion	0.7	675.00	472.50	Contingent
Silver, Thomas	7/12/2023	Drft: Reply re: Default and sanctions	0.8	675.00	540.00	Contingent
Silver, Thomas	7/14/2023	Comm: with CC conc. Re: default and sanctions procedures; Conf: with CC conc. Same; Rsch: case law on sanctions	4.1	675.00	2767.50	Contingent
Silver, Thomas	8/2/2023	Comm: with CC KM conc. Necessary pleadings and strategy	0.8	675.00	540.00	Contingent
Silver, Thomas	8/30/2023	Conf: with CC conc. case and potential settlement	0.9	675.00	607.50	Contingent
Silver, Thomas	8/30/2023	Rvw: Discovery docs produced	1.4	675.00	945.00	Contingent
Silver, Thomas	8/31/2023	Rsch: Washington properties and assets of Defendant	3.2	675.00	2160.00	Contingent
Silver, Thomas	9/27/2023	Drft: edits to motion to extend class dates and supp. docs	0.9	675.00	607.50	Contingent

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Silver, Thomas	11/14/2023	Conf: with BC conc. Motions for contempt; judicial subpoena and interim judgment; strategy	1.2	675.00	810.00	Contingent
Silver, Thomas	11/30/2023	Rvw: Substitution pleading; Conf: with BC conc. Road forward	0.8	675.00	540.00	Contingent
Silver, Thomas	12/1/2023	Rvw: pleadings filed by PC; Comm with CC conc. Pleadings	0.7	675.00	472.50	Contingent
Silver, Thomas	12/6/2023	Rvw: pleadings re OC conc. Stay and evidence on file; Rsch: relevant case law	3.4	675.00	2295.00	Contingent
Silver, Thomas	12/7/2023	Drft: Response to Motion	5.1	675.00	3442.50	Contingent
Silver, Thomas	12/8/2023	Drft: Final edits to Response	4.2	675.00	2835.00	Contingent
Silver, Thomas	12/13/2023	Rvw: OC Reply pleadings; Rvw: record	2.1	675.00	1417.50	Contingent
Silver, Thomas	12/14/2023	Lit: Prep for hearing	2.4	675.00	1620.00	Contingent
Silver, Thomas	1/5/2024	Rvw: Motion from OC; Conf: with CC conc. response	0.6	675.00	405.00	Contingent
Silver, Thomas	1/10/2024	Lit: Rvw and compare discovery responses; Rsch: housing at Rudeen	1.4	675.00	945.00	Contingent
Silver, Thomas	1/11/2024	Rvw: Correspondence from OC; Conf: with CC conc. response	0.4	675.00	270.00	Contingent
Silver, Thomas	1/12/2024	Drft: Rvw and edits to briefs and evidence; Declaration in support; Conf: with CC con case	2.9	675.00	1957.50	Contingent
Silver, Thomas	1/15/2024	Rvw: Tenant files and draft spreadsheet of class members	5.8	675.00	3915.00	Contingent
Silver, Thomas	1/16/2024	Comm: with CC conc. case	0.9	675.00	607.50	Contingent
Silver, Thomas	1/16/2024	Drft: Notices for Class; Rvw: Limited NOA disc. With CC	3.4	675.00	2295.00	Contingent
Silver, Thomas	1/17/2024	Drft: Notices for Class; Rvw: class notice from OC; Conf: with CC conc. Response; Comm: with OC conc. Notice and administration	2.9	675.00	1957.50	Contingent
Silver, Thomas	1/18/2024	Conf: with CC conc. Hearing and evidence (0.5); Lit: Prep evidence for hearing crosscheck (0.9)	1.4	675.00	945.00	Contingent
Silver, Thomas	1/19/2024	Conf: with CC conc. Hearing; Lit: prep for and attend hearing; Conf. with CC conc. Strategy going forward	3.6	675.00	2430.00	Contingent
Silver, Thomas	1/24/2024	Conf: with CC conc. Order of the Court; Drft: Revisions	0.5	675.00	337.50	Contingent
Silver, Thomas	1/29/2024	Comms: with OC	0.2	675.00	135.00	Contingent
Silver, Thomas	1/31/2024	Conf: with CC conc settlement and strategy, documents produced.	1.1	675.00	742.50	Contingent
Silver, Thomas	1/31/2024	Comm: With OC conc. Case; Conf: with CC re OC communications	0.5	675.00	337.50	Contingent
Silver, Thomas	2/7/2024	Rsch: Atty Negligence case law	2.3	675.00	1552.50	Contingent
Silver, Thomas	2/8/2024	Conf: with CC conc. Document files, strategy, and preservation	1	675.00	675.00	Contingent
Silver, Thomas	2/12/2024	Rsch: Issues related to Vacate and atty negligence	4.2	675.00	2835.00	Contingent
Silver, Thomas	2/20/2024	Conf: with CC BC conc. Strategy	0.5	675.00	337.50	Contingent
Silver, Thomas	2/21/2024	Comm: with Class administrator regarding motions and case	0.3	675.00	202.50	Contingent

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Silver, Thomas	2/23/2024	Rvw: Defs. Motions to Vacate and set aside; Conf: with CC conc. Motions and response	2.4	675.00	1620.00	Contingent
Silver, Thomas	2/26/2024	RsCh: case law on point (3.2); Drft: response (4.9); Conf: with Chris Hogue conc. Brief (0.5)	8.6	675.00	5805.00	Contingent
Silver, Thomas	2/27/2024	Drft: Response Brief; RsCh: applicable case law; collect evidence for brief	6.5	675.00	4387.50	Contingent
Silver, Thomas	2/28/2024	Conf: with CC conc. Brief (0.9); Drft: response; Collect evidence for brief	7.8	675.00	5265.00	Contingent
Silver, Thomas	2/29/2024	Drft: Response Brief and declaration	9.4	675.00	6345.00	Contingent
Silver, Thomas	3/1/2024	Drft: edits to brief and dec; Conf: with staff conc. Tasks to accomplish	6.5	675.00	4387.50	Contingent
Silver, Thomas	3/4/2024	Rvw: subpoena information	0.5	675.00	337.50	Contingent
Silver, Thomas	3/5/2024	Lit: Prep for Hearing; Conf: with CC disc. hearing	1.6	675.00	1080.00	Contingent
Silver, Thomas	3/6/2024	Lit: prep for hearing; Rvw: Reply; RsCh Case law cited by OC	6.4	675.00	4320.00	Contingent
Silver, Thomas	3/7/2024	Lit: Prep for hearing; Meeting with CC conc. hearing	6.1	675.00	4117.50	Contingent
Silver, Thomas	3/8/2024	Lit: Prep for and attend hearing; Conf (with CC conc. Road forward and strategy hearing results	8.8	675.00	5940.00	Contingent
Silver, Thomas	3/11/2024	Drft: draft and edits to Order (0.4); Comm: with OC conc. File issues and order (0.4); Conf: with CC conc. Order (0.9)	1.7	675.00	1147.50	Contingent
Silver, Thomas	3/13/2024	Conf: with CC and CL conc. Case and strategy and road forward	1.5	675.00	1012.50	Contingent
Silver, Thomas	3/18/2024	Conf: with CC CH conc. strategy and class administration	1	675.00	675.00	Contingent
Silver, Thomas	3/19/2024	Rvw: Class information prepared by OC; Conf: with CC disc. Strategy and response	4.1	675.00	2767.50	Contingent
Silver, Thomas	3/20/2024	Conf: with CC and staff regarding records and response; Drft: edits to response; Rvw: information production for facts asserted	3.7	675.00	2497.50	Contingent
Silver, Thomas	3/21/2024	Rvw: Production re class members; Drft: Edits of Response	3.1	675.00	2092.50	Contingent
Silver, Thomas	3/21/2024	Comm: PC to Class administrator concerning next steps	0.5	675.00	337.50	Contingent
Silver, Thomas	3/22/2024	Rvw: proposed order	0.3	675.00	202.50	Contingent
Silver, Thomas	4/4/2024	RsCh: Appeal rules; Rvw: Notice of filing; Conf: with CC conc. Strategy going forward	2.9	675.00	1957.50	Contingent
Silver, Thomas	4/9/2024	Rvw: NOH Motion to Seal; Conf: with CC conc. Mt. to Seal	0.3	675.00	202.50	Contingent
Silver, Thomas	4/17/2024	Rvw: comm from CR (0.1); Disc: with CC CH	0.4	675.00	270.00	Contingent
Silver, Thomas	4/19/2024	Rvw: notice of lien; RsCh: liens	2.4	675.00	1620.00	Contingent

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Silver, Thomas	5/2/2024	Rvw: discovery information	1.6	675.00	1080.00	Contingent
Silver, Thomas	5/3/2024	Drft: Reply to Motion for class scheduling order; proposed order; Conf with CC conc. Report and evidence (1.2)	3.2	675.00	2160.00	Contingent
Silver, Thomas	5/5/2024	Drft: Reply and proposed order scheduling	2.2	675.00	1485.00	Contingent
Silver, Thomas	5/7/2024	Drft: proposed order and Reply	5.8	675.00	3915.00	Contingent
Silver, Thomas	5/8/2024	Drft: edits to filings, filing and serving	3.2	675.00	2160.00	Contingent
Silver, Thomas	5/30/2024	Drft: edits to Response to discretionary appeal; Conf: with CC conc. Brief	1.7	675.00	1147.50	Contingent
Silver, Thomas	6/7/2024	Rvw: Order of the Court; Conf: with CC	3.4	675.00	2295.00	Contingent
Silver, Thomas	6/11/2024	Drft: spreadsheet of exclusions	4.8	675.00	3240.00	Contingent
Silver, Thomas	6/12/2024	Rvw: discovery information, produce spreadsheet for Recon	6.1	675.00	4117.50	Contingent
Silver, Thomas	6/13/2024	Lit: prep for and Attend hearing on review (0.9); Drft: Spreadsheet of exclusions (6.9); Conf: with CC conc. Response (1.4)	9.2	675.00	6210.00	Contingent
Silver, Thomas	6/14/2024	Drft: Spreadsheet of exclusions	6.2	675.00	4185.00	Contingent
Silver, Thomas	6/15/2024	Drft: Spreadsheet of exclusions; Rvw: pleadings on file	4.9	675.00	3307.50	Contingent
Silver, Thomas	6/17/2024	Drft: Dec in support of reconsideration; Edits to motion	5.6	675.00	3780.00	Contingent
Silver, Thomas	6/18/2024	Comm: email to Class admin conc. case	0.3	675.00	202.50	Contingent
Silver, Thomas	6/19/2024	Rvw: Offer with CC; Conf: with CC conc. Potential response	0.7	675.00	472.50	Contingent
Silver, Thomas	6/28/2024	Rvw: exhibits from OC	0.8	675.00	540.00	Contingent
Silver, Thomas	7/2/2024	Rvw: Response; Conf: with CC conc response and reply; Court order denying review	1.6	675.00	1080.00	Contingent
Silver, Thomas	7/9/2024	Rvw and Edit Reply; prep for filing	0.4	675.00	270.00	Contingent
Silver, Thomas	8/5/2024	Rvw: decision fr Court; conf: with CC conc. Steps moving forward	0.9	675.00	607.50	Contingent
Silver, Thomas	8/12/2024	Rvw: Motion from OC; Conf: with CC disc. response	0.6	675.00	405.00	Contingent
Silver, Thomas	8/15/2024	Drft: edits to brief re response to clarify motion; Conf: with CC conc road forward	1.6	675.00	1080.00	Contingent
Silver, Thomas	8/16/2024	Rvw: Brief and edits	0.4	675.00	270.00	Contingent
Silver, Thomas	9/16/2024	Rvw: discovery docs for deposit issues	4.8	675.00	3240.00	Contingent
Silver, Thomas	9/17/2024	Conf: with CC conc case	1.5	675.00	1012.50	Contingent
Silver, Thomas	10/1/2024	Rvw: Motion to Strike; Lit: file and Serve Motion	1.1	675.00	742.50	Contingent
Silver, Thomas	11/1/2024	Conf: with CC discussing case and possible sur reply	0.9	675.00	607.50	Contingent
Silver, Thomas	11/12/2024	Rvw: Decision of Court; Conf: with CC conc. Road forward and administration	1.6	675.00	1080.00	Contingent

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Silver, Thomas	11/22/2024	Drft: Declaration; Edits to Motion	1.5	675.00	1012.50	Contingent
Silver, Thomas	12/3/2024	Rvw: Discovery information regarding class members; Conf: with CC conc. Results and exclusions (0.5)	3.2	675.00	2160.00	Contingent
Silver, Thomas	12/18/2024	Comm and Conf with CL conc. Status of case and update	0.9	675.00	607.50	Contingent
Silver, Thomas	12/19/2024	Rvw: Objection Pleadings fr. Defendant and verify case law (0.8); Drft: Reply (3.3)	4.1	675.00	2767.50	Contingent
Silver, Thomas	12/20/2024	Rvw: objection documentation (1.2); Conf: with CC conc. Findings (0.4)	1.6	675.00	1080.00	Contingent
Silver, Thomas	12/22/2024	Drft: Reply brief, declaration in support	0.9	675.00	607.50	Contingent
Silver, Thomas	12/23/2024	Drft final edits to brief (0.9), Conf. with RB conc. Declaration and draft, and file and serve brief (1.2)	2.1	675.00	1417.50	Contingent
Silver, Thomas	1/14/2025	Cong: With CC CH conc. Case scheduling and settlement (1.2); Drft: Motion and Order for Case Schedules (1.6)	3.8	675.00	2565.00	Contingent
Silver, Thomas	1/14/2025	Conf: Counsel re case scheduling and mediation (1.0); Drft: Order (0.5)	1.5	675.00	1012.50	Contingent
Silver, Thomas	1/15/2025	Drft: Motion and Order for Case scheduling	2.6	675.00	1755.00	Contingent
Silver, Thomas	1/17/2025	Drft: Final edits to Motion and Order after CC changes; File and Serve (1.9); Conf: with CC conc. Scheduling issue (0.2)	2.1	675.00	1417.50	Contingent
Silver, Thomas	1/31/2025	Comm: with OC conc. Hearing	0.1	675.00	67.50	Contingent
Silver, Thomas	2/5/2025	Rvw: CC LTR; Comm: with CC	0.3	675.00	202.50	Contingent
Silver, Thomas	2/7/2025	Rvw: Response; Conf: with CC conc. Case and response	0.8	675.00	540.00	Contingent
Silver, Thomas	2/11/2025	Conf: with CC conc. Strategy going forward; Rvw: Comm: from CC to OC conc. Protective order	0.7	675.00	472.50	Contingent
Silver, Thomas	2/12/2025	Conf: with CC conc. Dfs' Response and Reply focus	0.9	675.00	607.50	Contingent
Silver, Thomas	2/12/2025	Drft: declaration draft: rvw and edit Reply; Lit: File	1.4	675.00	945.00	Contingent
Silver, Thomas	2/14/2025	Lit: Attend hearing (0.9); Conf: with CC conc. Hearing and issues (0.6)	1.5	675.00	1012.50	Contingent
Silver, Thomas	2/20/2025	Rvw: Exclusions	1.7	675.00	1147.50	Contingent
Silver, Thomas	2/21/2025	Rvw: Exclusions; Memo to Decertify; Conf: with CC conc case	2.6	675.00	1755.00	Contingent
Silver, Thomas	2/24/2025	Conf: with CC conc brief arguments to make (0.5); Rvw: Exclusion claims (1.1); Judge's Order (0.1); Rsch: decertification case law (1.4)	3.1	675.00	2092.50	Contingent
Silver, Thomas	2/26/2025	Rsch: Case law on decertification; individualized questions; rigorous analysis; Conf: with CC conc. Brief response and Def.'s Motion	6.2	675.00	4185.00	Contingent

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Silver, Thomas	2/27/2025	Drft: Rsch trail case law for decert response	2.3	675.00	1552.50	Contingent
Silver, Thomas	2/28/2025	Drft: Decert Response edits	1.6	675.00	1080.00	Contingent
Silver, Thomas	3/3/2025	Comm: with CC conc. Lease information; Rvw: produced leases	2.9	675.00	1957.50	Contingent
Silver, Thomas	3/7/2025	Lit: Rvw: hearing pleadings (0.7); Attend hearing re: decert (0.9); Conf: with CC conc. Hearing and result (1.9)	3.6	675.00	2430.00	Contingent
Silver, Thomas	3/10/2025	Comm: with CC conc. case	0.2	675.00	135.00	Contingent
Silver, Thomas	3/11/2025	Rvw: Exclusion claims	4.2	675.00	2835.00	Contingent
Silver, Thomas	3/12/2025	Rvw: Exclusion claims	7.9	675.00	5332.50	Contingent
Silver, Thomas	3/13/2025	Rvw: Exclusion claims; Verify lease amounts	6.2	675.00	4185.00	Contingent
Silver, Thomas	3/14/2025	Drft: Edits to Response, Present data and argument to CC CH	5.2	675.00	3510.00	Contingent
Silver, Thomas	3/21/2025	Comm: with CL conc. check	0.1	675.00	67.50	Contingent
Silver, Thomas	3/26/2025	Conf: with CC conc. Atty fees	0.4	675.00	270.00	Contingent
Silver, Thomas	3/28/2025	Rvw: Reply from Defendants (0.3); Conf: with CC CH c. Reply and arguments (0.5)	0.8	675.00	540.00	Contingent
Silver, Thomas	3/28/2025	Rvw: Comms; Drft: Edits to Sanctions proposed Order	0.2	675.00	135.00	Contingent
Silver, Thomas	4/18/2025	Rvw: Dfs 2nd NODR; Conf: with CC conc. Strategy	0.8	675.00	540.00	Contingent
Silver, Thomas	4/23/2025	Drft: Class Notices; Comm: email to CC conc timing issues	2.8	675.00	1890.00	Contingent
Silver, Thomas	4/24/2025	Drft: Proposed Order, edits to notices; Conf with CC conc. Order and class admin	3.8	675.00	2565.00	Contingent
Silver, Thomas	4/25/2025	Conf: with CH and BM conc. Edits to notices	0.6	675.00	405.00	Contingent
Silver, Thomas	6/23/2025	Rvw: Verify exclusion requests of Defendant	5.7	675.00	3847.50	Contingent
Silver, Thomas	6/24/2025	Rvw: Verify exclusion requests of Defendant	6.9	675.00	4657.50	Contingent
Silver, Thomas	6/25/2025	Rvw: Verify exclusion requests of Defendant	11.2	675.00	7560.00	Contingent
Silver, Thomas	6/26/2025	Lit: Attend hearing on Disc. Review (0.5); Rvw: Exclusion requests of Defendant (3.6); Drft: Declaration Review data (6.7)	10.8	675.00	7290.00	Contingent
Silver, Thomas	6/30/2025	Drft: Edits to spreadsheet, declaration in support, prepare evidence	8.2	675.00	5535.00	Contingent
Silver, Thomas	9/12/2025	Conf: with CC conc. Case and motion	0.3	675.00	202.50	Contingent
Silver, Thomas	10/1/2025	Rvw: Order of Div III; conf: with CC conc road forward	0.6	675.00	405.00	Contingent
Silver, Thomas	10/2/2025	Rsch: Fee issues case law; scheduling issues; Conf: with CC conc. such	1.1	675.00	742.50	Contingent
Silver, Thomas	10/3/2025	Drft: Motion to Shorten time; Conf: with CC conc. Dates necessary	1.4	675.00	945.00	Contingent
Silver, Thomas	10/10/2025	Lit: Attend Hearing (0.4 WO); Conf: with CC CH conc. Hearing, road forward and argument (0.6)	0.6	675.00	405.00	Contingent

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Silver, Thomas	10/24/2025	Conf: with CC conc. Notice and requirements; Rvw: OC Notice	0.6	675.00	405.00	Contingent
Silver, Thomas	11/3/2025	Comm: with CC, Class Admin regarding class admin	0.2	675.00	135.00	Contingent
Silver, Thomas	11/13/2025	Rvw: COF	0.1	675.00	67.50	Contingent
Silver, Thomas	11/21/2025	Rvw: mailing lists	0.7	675.00	472.50	Contingent
Silver, Thomas	11/24/2025	Conf: with CC CH conc. Deposits and settlement potential	2.4	675.00	1620.00	Contingent
Silver, Thomas	11/25/2025	Lit: review spreadsheets and numbers; Conf: with CC BC conc. Numbers; Comm: w/ CC conc. Same	1.9	675.00	1282.50	Contingent
Silver, Thomas	12/1/2025	Comm: with Class admin; Conf: with CC conc. case	1.5	675.00	1012.50	Contingent
Silver, Thomas	12/4/2025	Conf: with CC conc. Settlement and strategy	0.7	675.00	472.50	Contingent
Silver, Thomas	12/5/2025	Conf: with CC CH conc. Case; Comm: PC to Moreno conc. mediation	0.8	675.00	540.00	Contingent
Silver, Thomas	12/7/2025	Rvw: Numbers for settlement	0.6	675.00	405.00	Contingent
Silver, Thomas	12/8/2025	Comm: with Class admin conc. notice	0.2	675.00	135.00	Contingent
Silver, Thomas	12/16/2025	Lit: Prep for mediation; Conf: with CC conc. Mediation strategy	2.1	675.00	1417.50	Contingent
Silver, Thomas	12/17/2025	Lit: Prep for and attend mediation	10.1	675.00	6817.50	Contingent
Silver, Thomas	1/1/2026	Rvw: Evidence file; Rsch: preapproval; Drft: Memo in support of preapproval	10.1	675.00	6817.50	Contingent
Silver, Thomas	1/2/2026	Drft: memo, and orders preapproval	12.1	675.00	8167.50	Contingent
Silver, Thomas	1/3/2026	Drft: preapproval docs	4.1	675.00	2767.50	Contingent
Silver, Thomas	1/26/2026	Drft: Orders, Settlement agreement and edit pleadings	5.2	675.00	3510.00	Contingent
Silver, Thomas	1/27/2026	Drft: Edits to Orders and Settlement Agreement	2.2	675.00	1485.00	Contingent
Silver, Thomas	1/30/2026	Drft: Edits to Orders	0.5	675.00	337.50	Contingent
Silver, Thomas	2/3/2026	Drft: edits to preapproval pleadings	1.4	675.00	945.00	Contingent
Silver, Thomas	2/17/2026	Rvw: OPs edits to prelim approval docs	0.5	675.00	337.50	Contingent
Silver, Thomas	2/19/2026	Rvw: suggested edits to pleadings; Conf: with CC conc. changes	0.9	675.00	607.50	Contingent
Silver, Thomas	2/21/2026	Comm: with CL conc. settlement	0.2	675.00	135.00	Contingent
Silver, Thomas	2/24/2026	Rvw: Email fr. CT; Conf: with BJM conc. Road forward	0.2	675.00	135.00	Contingent
Silver, Thomas	3/20/2026	Rvw: Email from counsel; Comm: with CC conc. motion	0.2	675.00	135.00	Contingent
Silver, Thomas	3/27/2026	Drft: Memo in Support of Fees	7.8	675.00	5265.00	Contingent
Silver, Thomas	3/29/2026	Drft: Memo and other docs in support of fees; time sheet compilation	6.9	675.00	4657.50	Contingent
Silver, Thomas	3/30/2026	Drft: edits to pleadings; time compilation	0.8	675.00	540.00	Contingent
TOTAL			538	675.00	\$363,150.00	

ATTY: attorney
CLT: client
Conc: concerning

Drft: draft
DF: defendant
Mot: Motion

OC: opposing counsel
OIC: Office of the Insurance Commissioner
PF: plaintiff

Ph: telephone
Rsch: research
Rvw: review