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9 *Attorneys for Plaintiff and Class*

10 IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

11	BRIANNA MORRIS, on behalf of)	
12	herself and all others similarly situated,)	Case No.: 2:19-CV-0128-TOR
)	
13	Plaintiff,)	
)	DECLARATION OF KIRK D.
14	vs.)	MILLER IN SUPPORT OF
)	PLAINTIFF’S UNOPPOSED
15	FPI MANAGEMENT, INC., a)	MOTION FOR FINAL APPROVAL
	California corporation,)	OF CLASS SETTLEMENT
16)	
	Defendant.)	Hearing Date: February 3, 2022
17)	Time: 10:00 a.m.
)	
18)	

1 Kirk D. Miller, upon penalty of perjury under the laws of the United States,
2 28 U.S.C. § 1746, declares the following:

3 1. I am one of the attorneys representing Plaintiff in this matter.

4 2. This Declaration is based on my personal knowledge.

5 3. The parties, through counsel, engaged in mediation and settlement
6 discussions over an extended period of time which ultimately resulted in the
7 Settlement Agreement.

8 4. Class Counsel spent a considerable amount of time engaging in
9 written discovery, document review, data analysis, negotiation, and analyzing legal
10 issues related to the lawsuit's claims.

11 5. Class Counsel has a significant amount of experience in consumer
12 individual and class actions, including consumer protection actions involving debt
13 collection, and know from our own experience that any case involving a class of
14 consumers can, and often does, lead to costly litigation that goes on for years.

15 6. Class Counsel has thoroughly analyzed the factual and legal issues
16 involved in this case.

17 7. In addition to the monetary relief achieved for the Class Members and
18 proposed *cy pres* recipients, Defendant also changed its tenant screening and
19 holding fee processes to assure conformance with Washington law.
20

1 8. Out of the more than 35,829 Class Members who received notice,
2 none of the Class Members objected to the Settlement or any terms therein.

3 Further, only two (2) Class Members requested exclusion from the Settlement.

4 9. The 35,827 Settlement Class Members will receive payments in the
5 amount of \$30.67.

6 10. The proposed *cy pres* recipients are nonprofits Northwest Justice
7 Project, Family Promise Spokane, and Consumer Education and Training Services
8 (CENTS). Northwest Justice Project has a dedicated fair housing unit and accepts
9 direct representation of low-income clients who are facing rental housing legal
10 problems. Family Promise Spokane is a Washington-based non-profit, which
11 houses homeless families, works to prevent homelessness, and provides services to
12 families before, during, and after incidents that have or could lead to a housing
13 crisis for the family. CENTS provides training and education to empower generally
14 vulnerable consumers to prevent or overcome financial challenges.

15 11. Class Counsel have spoken with a number of Class Members, and
16 they have expressed satisfaction, gratitude and appreciation for the result of this
17 case.

18 12. To the best of my knowledge, no government entity has objected to
19 this Settlement.

1
2 **CM/ECF Certificate of Service**

3 I hereby certify that on the 18th day of January, 2022, I electronically filed
4 the foregoing with the Clerk of the Court using the CM/ECF System which will
5 send notification of filing to the following:

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17 *s/ Teri A. Brown*
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