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FILED
2025 OCT 06 04:26 PM
KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE #: 24-2-16171-6 SEA

Honorable Sean P. O'Donnell
Hearing Time: December 5, 2025
Hearing Time: 9:00 a.m.
With Oral Argument

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

LAKISHA LEWIS and CZARINA SLAPE,
individually and on behalf of all others
similarly situated,

Plaintiffs

v.

SEATTLE HOUSING AUTHORITY,

Defendant

Case No. 24-2-16171-6 SEA

**DECLARATION OF JOAN M.
PRADHAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARD**

I am counsel for Plaintiffs in the above captioned case. This declaration supports Plaintiffs' Motion for Final Approval and Plaintiffs' Motion for Attorneys' Fees, Costs, and Service Award. I have personal knowledge of the facts in this declaration and could testify to them if called on to do so.

2. My law firm, Tousley Brain Stephens PLLC, has extensive experience as class counsel, including in cases alleging consumer fraud, as detailed in Class Counsel's firm resume, filed at Dkt. 14 (Declaration of Kaleigh N. Boyd In Support of Plaintiff's Motion for Preliminary Approval, Exhibit 2). In addition, I have personal experience supporting Ms. Boyd and Tousley Brain Stephens as Settlement Class Counsel in this action, supporting the numerous

DECLARATION OF JOAN M. PRADHAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS AND
SERVICE AWARD - 1

TOUSLEY BRAIN STEPHENS PLLC
1200 Fifth Avenue, Suite 1700
Seattle, Washington 98101
TEL. 206.682.5600 • FAX 206.682.2992

1 data breach class actions my firm is class counsel for, and have recently been appointed interim
2 co-lead class counsel in the *In re: Pierce County Library System Data Breach Litigation*, Pierce
3 County Lead Case No. 25-5-11297-2.

4 3. Class Counsel's total request for fees and costs is 30% of the common fund, which
5 equates to \$145,800.00. This fee is inclusive of attorneys' fees of \$143,209.09 and the litigation
6 costs that Class Counsel has expended to date, which totals \$ 2,590.91.
7

8 **LITIGATION BACKGROUND AND THE WORK OF CLASS COUNSEL**

9 5. Tousley Brain Stephens PLLC devoted significant time and resources to this case
10 to date, including, but not limited to:

- 11 a. Conducting an investigation into the facts regarding Plaintiffs' claims and
12 class members' claims;
- 13 b. Researching law relevant to Plaintiffs' claims and preparing Plaintiffs'
14 class action complaint;
- 15 c. Engaging in extensive, arms-length settlement negotiations;
- 16 d. Negotiating and preparing the Parties' class action settlement agreement,
17 along with the proposed class notice and claim form;
- 18 e. Preparing Plaintiffs' motion for preliminary approval of the class action
19 settlement and preparing a detailed declaration in support;
- 20 f. Working with the Settlement Administrator to ensure the timely
21 completion of Notice and processing of claims;
- 22 g. Responding to class member inquiries; and
- 23 h. Conferring with Plaintiffs throughout the case.

24 6. Since preliminary approval, Tousley Brain Stephens, PLLC has worked closely
25
26
27

1 with EAG Gulf Coast LLC (“EAG”), the Settlement Administrator, to ensure the settlement
2 proceeded according to plan. My firm has reviewed and edited what EAG posted on the settlement
3 website, responded to Class Member inquiries, and conferred with EAG and Defendant’s Counsel
4 on issues that arose during the claims administration process. The period for which Settlement
5 Class Members may submit claims, opt-outs, and objections is not until November 19, 2025, and
6 we anticipate further involvement overseeing administration of the claims process during this time.
7 In addition, we anticipate further involvement with EAG and Defendant’s Counsel in the months
8 after Final Approval to ensure a full settlement for the Class.
9

10 **PLAINTIFFS’ CONTRIBUTION**

11 7. Plaintiffs Lakisha Lewis and Czarina Slape seek Service Awards in the amount of
12 \$4,000 each (\$8,000 in total) in recognition of their time and effort spent pursuing this Litigation
13 on behalf of the Class.
14

15 8. Throughout the litigation, Ms. Lewis and Ms. Slape performed important work on
16 the case, including gathering facts and documents, assisting Class Counsel with allegations in
17 Complaint, keeping abreast of the litigation, signing the settlement agreement on behalf of the
18 Class, and maintaining communication with Class Counsel throughout the litigation. Without Ms.
19 Lewis and Ms. Slape’s involvement on behalf of the Class, this action would not have been
20 possible.
21

22 **CONTINGENT NATURE OF THE ACTION**

23 9. Tousley Brain Stephens took on this case on a purely contingent basis. Plaintiffs’
24 Counsel has a standard fee agreement with the named Plaintiff calling for 33–40 percent of the
25 recovery to be paid as attorneys’ fees, plus costs, in the event that this action settled or was taken
26 to judgment on an individual basis.
27

1 10. This matter has required us to spend time on this litigation that could have been
2 spent on other matters. At various times during the litigation of this class action, this lawsuit has
3 consumed significant amounts of our time and our firm's time. We devoted substantial resources
4 to the prosecution of this case with no guarantee that we would be compensated for our time or
5 reimbursement for our expenses.
6

7 11. Such time could otherwise have been spent on other fee-generating work. Because
8 we undertook representation of this matter on a contingency-fee basis, we shouldered the risk of
9 expending substantial costs and time in litigating the action without any monetary gain in the event
10 of an adverse judgment.

11 12. Litigation is inherently unpredictable and therefore risky. Therefore, despite our
12 devotion to the case and our confidence in the claims alleged against Defendant, there were many
13 factors beyond our control that posed significant risks.
14

15 **LITIGATION EXPENSES**

16 13. All books and records in this case regarding costs expended were maintained in
17 the ordinary course of business, from expense vouchers and check records. We have reviewed the
18 records of costs expended in this matter.

19 14. Through October 6, 2025, Tousley Brain Stephens incurred \$ 2,590.91 in
20 reasonable expenses necessary for litigation, which include filing fees, and necessary
21 research.
22

Category	Amount
Reproductions	\$ 12.98
Outside Copies	\$ 92.96
Filing Fees	\$ 245.48

Messenger	\$ 60.00
Professional Services and Advances	\$ 1,870.00
Computer Research	\$ 309.49
Total	\$ 2,590.91

15. My firm will expend additional time dealing with any objections, preparing for and attending the Final Approval Hearing, defending any appeals taken from the final judgment approving settlement, and ensuring that the claims process and distribution of settlement proceeds to class members is done in a timely manner in accordance with the terms of the settlement. To date, Class Counsel has received no compensation for their work on this case.

16. It is my opinion that the attorneys' fees sought in the motion for attorneys' fees are reasonable and constitute fair and reasonable compensation for undertaking this case on a contingency basis and for obtaining the relief for Plaintiffs and the Class. The time we devoted to this case is reasonable. We prosecuted the claims at issue efficiently and effectively. As set forth in the Settlement Agreement, the attorneys' fees, costs and expenses sought in this motion will not reduce the benefits payable to the class.

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

Executed on this 6th day of October, 2025, in Seattle, Washington.

By: s/ Joan M. Pradhan
Joan M. Pradhan, WSBA #58134

I certify that this memorandum contains 1,036 words, in compliance with the Local Civil Rules.

1 DATED this 6 October 2025.

2 Respectfully submitted,

3 /s/ Joan M. Pradhan

4 Kaleigh N. Boyd, WSBA #52684

5 Joan M. Pradhan, WSBA #58134

6 **TOUSLEY BRAIN STEPHENS PLLC**

7 1200 Fifth Avenue, Suite 1700

8 Seattle, WA 98101

9 Telephone: 206-682-5600

10 Facsimile: 206-682-2992

11 kboyd@tousley.com

12 jpradhan@tousley.com

1 **CERTIFICATE OF SERVICE**

2 I declare and state that I am a citizen of the United States and resident of the state of
3 Washington, over the age of 18 years, not a party to the above-entitled action, and am competent
4 to be a witness herein. My business address and telephone number are 1700 Seventh Avenue,
5 Suite 2200, Seattle, Washington 98101, telephone 206.682.5600.
6

7 On October 6, 2025, I caused to be served the foregoing document on the individual
8 named below via King County Portal E-Service:

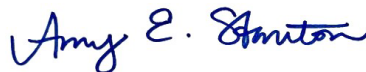
9 John T. Mills
10 Brian Middlebrook
11 **Gordon Rees**
12 1 Battery Park Plaza, 28th Floor
13 New York, NY 10004
14 jtmills@grsm.com
15 bmiddlebrook@grsm.com

16 Shannon Wodnik
17 **Gordon Rees**
18 701 Fifth Avenue
19 Suite 2100
20 Seattle, WA 98104
21 swodnik@grsm.com

22 *Attorneys for Defendant*

23 I declare under penalty of perjury under the laws of the state of Washington and the
24 United States that the foregoing is true and correct.

25 Executed this 6th day of October, 2025, at Seattle, Washington.

26 

27 Amy E. Stanton, Sr. Paralegal