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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

WILLIAM LOFTUS, SIDNEY NAIMAN, and
LOUIS NAIMAN, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

SUNRUN INC., and MEDIA MIX 365, LLC, and
DOES 1-10,

Defendants.

Case No. 3:19-cv-01608-RS

Hon. Richard Seeborg

**Declaration of Anthony I. Paronich in Support of Plaintiffs' Unopposed Motion for
Preliminary Approval of Class Action Settlement**

I, Anthony I. Paronich, declare under penalty of perjury:

1. I make this affidavit in support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement. I have personal knowledge of the facts set forth in this declaration, and could testify competently to them if called upon to do so.

2. I am an attorney duly admitted to practice in the Commonwealth of Massachusetts, I am over 18 years of age, am competent to testify and make this affidavit on personal knowledge. I have extensive experience in the prosecution of class actions on behalf of consumers, particularly claims under the TCPA.

3. I was involved in every stage of representing Plaintiffs in this case, from pre-trial investigation, analysis of Plaintiffs' potential claims, drafting and researching motions, review of documents, discovery responses, and general preparation for settlement, class certification and trial. I also participated in settlement negotiations and strategy, participated in the mediation process, and contributed to preparing the proposed settlement agreement and motion for preliminary approval.

4. I am a 2010 graduate of Suffolk Law School. In 2010, I was admitted to the Bar in Massachusetts. Since then, I have been admitted to practice before the Federal District Court for the

1 District of Massachusetts. From time to time, I have appeared in other State and Federal District
2 Courts *pro hac vice*. I am in good standing in every court to which I am admitted to practice.

3 5. I was an associate at Broderick Law, P.C. in Boston, Massachusetts from 2010
4 through 2016.

5 6. I was a partner at Broderick & Paronich, P.C. in Boston, Massachusetts from 2016
6 through 2019.

7 7. In 2019, I started Paronich Law, P.C., focused on protecting consumers in class action
8 lawsuits.

9 8. I have been appointed class counsel in more than 25 TCPA cases, including the
10 following:

- 11 i. Desai and Charvat v. ADT Security Services, Inc., USDC, ND. Ill., Civil Action No. 11-CV-1925, TCPA class settlement of \$15,000,000 granted final approval on June 21, 2013.
- 12 ii. Jay Clogg Realty Group, Inc. v. Burger King Corporation, USDC, D. MD., Civil Action No. 13-cv-00662, TCPA class settlement of \$8,500,000 granted final approval on April 15, 2015.
- 13 iii. Charvat v. AEP Energy, Inc., USDC, ND. Ill., 1:14-cv-03121, TCPA class settlement of \$6,000,000 granted final approval on September 28, 2015.
- 14 iv. Bull v. US Coachways, Inc., USDC, ND. Ill., 1:14-cv-05789, TCPA class settlement finally approved on November 11, 2016 with an agreement for judgment in the amount of \$49,932,375 and an assignment of rights against defendant's insurance carrier.
- 15 v. Smith v. State Farm Mut. Auto. Ins. Co., et. al., USDC, ND. Ill., 1:13-cv-02018, TCPA class settlement of \$7,000,000.00 granted final approval on December 8, 2016.
- 16 vi. Mey v. Frontier Communications Corporation, USDC, D. Ct., 3:13-cv-1191-MPS, a TCPA class settlement of \$11,000,000 granted final approval on June 2, 2017.
- 17 vii. Heidarpour v. Central Payment Co., USDC, MD. Ga., 15-cv-139, a TCPA class settlement of \$6,500,000 granted final approval on May 4, 2017.
- 18 viii. Thomas Krakauer v. Dish Network, L.L.C., USDC, MD. NC., Civil Action No. 1:14-CV-333 on September 9, 2015. Following a contested class certification motion, this case went to trial in January of 2017 returning a verdict of \$20,446,400. On May 22,

1 2017, this amount was trebled by the Court after finding that Dish Network’s
2 violations were “willful or knowing”, for a revised damages award of \$61,339,200.
(Dkt. No. 338).

- 3 ix. Charvat v. Carnival Corporation & PLC, et. al., USDC, ND. Ill., 1:13-cv-00042, a
4 TCPA class settlement of \$12,500,000 granted preliminary approval on July 6, 2017.
- 5 x. Abante Rooter and Plumbing, Inc. v. Birch Communications, Inc., USDC, ND Ga.,
6 1:15-CV-03562-AT, a TCPA class settlement of \$12,000,000 granted final approval
on December 14, 2017.
- 7 xi. Abante Rooter and Plumbing, Inc. v. Pivotal Payments, Inc., USDC, ND. Ca., 3:16-
8 cv-05486-JCS, a TCPA class settlement of \$9,000,000 granted final approval on
October 15, 2018.
- 9 xii. In re Monitronics International, Inc., USDC, ND. WV., 1:13-md-02493-JPB-JES, a
10 TCPA class settlement of \$28,000,000 granted final approval on June 12, 2018.

11 9. In light of the risks inherent in class action litigation, as well as my experience
12 litigating dozens of TCPA action settlements, it is my opinion that the pending settlement is an
13 excellent result for consumers and members of the class. The settlement is well within the range of
14 other TCPA settlements on a dollars-per-class-member basis.
15

16 PURSUANT TO 28 U.S.C. § 1746, I DECLARE SIGNED UNDER PENALTY OF PERJURY
17 OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT
18 EXECUTED THIS 7th DAY OF AUGUST 2020 IN THE COMMONWEALTH OF
MASSACHUSETTS.

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20 /s/ Anthony I. Paronich
Anthony I. Paronich
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