	E-Served: Jul 24 2024 7:38PM PDT Via Case Anywhere					
1 2 3 4 5 6 7 8 9 10		E STATE OF CALIFORNIA				
11 12	COUNTY OF LOS ANGEI MAUREEN HARROLD, individually and on behalf of all others similarly situated,	CES, CENTRAL DISTRICT Case No. BC680214				
13 14	Plaintiff,	(Assigned for All Purposes to the Honorable Elaine Lu, Dept. 9)				
15	v.	SUPPLEMENTAL DECLARATION OF				
16 17 18	MUFG UNION BANK, N.A., Defendant.	JONATHAN M. STREISFELD IN SUPPORT OF UNOPPOSED MOTION FOR ATTORNEYS' FEES, COSTS, AND INCENTIVE AWARD IN RESPONSE TO THE COURT'S JULY 24, 2025, TENTATIVE RULING				
19 20		D ( 1.1. 25. 2024				
20 21		Date: July 25, 2024 Time: 10:00 A.M.				
22		Complaint Filed: October 19, 2017				
23		Amended Complaint Filed: July 29, 2020				
24		Trial Date: None Set				
25	I, Jonathan M. Streisfeld, declare as follo	ws:				
26	1. I am one of the appointed Class	Counsel under the Settlement with MUFG Union				
27	Bank, N.A. ("Defendant"). I submit this declar	ration in response to the Court's July 24, 2025,				
28	SUPPLEMENTAL DECLARATION OF JONATHAN M. STREISFELD IN SUPPORT OF UNOPPOSED MOTION FOR ATTORNEYS' FEES, COSTS, AND INCENTIVE AWARD Case No. BC680214 2					

Tentative Ruling, requiring additional information supporting the Unopposed Motion for Attorneys'
 Fees, Costs, and Incentive Award. I have personal knowledge of the facts set forth in this declaration
 and could testify competently to them if called upon to do so.

4 2. To answer the Court's question of whether any of the expert fees listed in the costs
5 are for attorney services, I can state that none of the expert fees sought are for attorney services.

6 3. Specifically, all of those fees are for expert Arthur Olsen's work in this case. Class 7 Counsel retained Arthur Olsen, of Cassis Technology, a preeminent expert in evaluating and 8 analyzing bank data necessary to identify APSN Fees using the classwide account-level transaction 9 data maintained by Defendant for the Class Period. To prepare for mediation, Mr. Olsen assisted 10 Class Counsel in scrutinizing Defendant's estimate of most probable damages and Defendants' aggregate Overdraft Fee information. Once the Parties agreed to settle in principle, Mr. Olsen 11 12 employed his experience and expertise in analyzing financial data of dozens of other banks and 13 credit unions in other cases challenging overdraft fees to identify the Accountholders in the 14 Settlement Class who were assessed APSN Fees and the number of APSN Fees associated with each Account. Mr. Olsen spoke with Defendant's representatives to confirm availability of necessary 15 16 data. Mr. Olsen's damages analysis was provided to Defendant to add the names, addresses, and 17 email addresses to the Settlement Class list that was provided to the Settlement Administrator. Mr. 18 Olsen's work allowed the Parties to deliver a class list to the Settlement Administrator for the Notice 19 Program and ultimate distribution of the Net Settlement Fund. Attached as Exhibit A is Mr. Olsen's 20 invoice for \$21,700.00, confirming 62 hours of work at \$350.00 per hour.

4. I also confirm that the litigation cost amount to be awarded should be reduced from
\$60,458.10 to \$53,299.09, correcting an ambiguity in Section II.B. of the Motion, which states the
lower amount had actually been incurred.

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

Executed this 24th day of July 2024, at Fort Lauderdale, Florida.

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27

28

<u>/s/ Jonathan M. Streisfeld</u> Jonathan M. Streisfeld

## **EXHIBIT A**



Cassis Technology, LLC ATTN: Arthur Olsen 24777 NE 11th Street Sammamish, WA 98074 1-877-600-5656

## Bill To

Kaliel, PLLC Jeffrey Kaliel 1875 Connecticut Avenue NW 10th Floor Washington, DC 20009

Date	Invoice #
1 / 2 3 / 2 0 2 3	2508

Terms	Due Date
Net 30	2 / 2 2 / 2 0 2 3

Quantity	Description	Hourly Rate	Serviced	Amount
3	Litigation Support – Union Bank (Harrold)	350.00	3/31/2022	1,050.00
	Litigation Support – Union Bank (Harrold)	350.00	4 / 3 0 / 2 0 2 2	700.00
5	Litigation Support – Union Bank (Harrold)	350.00	6 / 30 / 2022	1,750.00
1	Litigation Support – Union Bank (Harrold)	350.00	8 / 3 1 / 2 0 2 2	350.00
7	Litigation Support – Union Bank (Harrold)	350.00	11/30/2022	2,450.00
13	Litigation Support – Union Bank (Harrold)	350.00	12/31/2022	4,550.00
31	Litigation Support - Union Bank (Harrold)	350.00	1/31/2023	10,850.00
			Sales Tax (0.0%)	\$0.00
			Subtotal	\$21,700.00
			Total Due	\$21,700.00