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7 Attorneys for Plaintiffs in *Espinosa, et al. v. Hyundai Motor America, et al.*  
8 [Plaintiffs, Lillian E. Levoff, Thomas Ganim, Daniel Baldeschi]

9  
10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA  
12

13 **IN RE: HYUNDAI AND KIA FUEL**  
14 **ECONOMY LITIGATION**

MDL Case No.: 2:13-ml-2424-GW (FFMx)  
Hon. George H. Wu

15  
16 **DECLARATION OF LILLIAN E.**  
17 **LEVOFF IN SUPPORT OF**  
18 **PLAINTIFFS' MOTION FOR**  
19 **ATTORNEY FEES AND COSTS**  
20 **AND INCENTIVE AWARDS TO**  
21 **THE CLASS REPRESENTATIVES**

22 Date: February 26, 2015  
Time: 8:30 a.m.  
Courtroom: 10

23 I, Lillian E. Levoff, declare as follows:  
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- 25 1. I am one of the named plaintiffs in the above-captioned case entitled *In Re: Hyundai Kia*  
26 *Fuel Economy Litigation*, MDL Case No.: 2:13-ml-2424-GW (FFMx) and have been involved in  
27 this litigation since June of 2012.  
28

1           2.       The following facts are within my personal knowledge or based on my records, and if  
2 called upon as a witness, I could and would testify thereto.

3           3.       Since becoming involved in this case, I have run my own solo legal practice, the Law  
4 Offices of Lillian E. Levoff. In my practice I specialize in estate planning and business transactions.

5           4.       Because I run my own business, to the extent that I have devoted time to this litigation, I  
6 have done so at the expense of my practice and have accordingly forgone opportunities for paying work.  
7 I have spent significant time prosecuting this action without any monetary payments or benefits.

8           5.       I have participated in various tasks during my involvement in this class action case,  
9 including meeting with counsel, gathering documents and reviewing personal records, reviewing  
10 documents and pleadings, responding to discovery, providing declarations and preparing for and being  
11 deposed. I have been in continuous contact with my counsel, through email and by telephone. I have  
12 estimated the time spent during my involvement in the case, which has amounted to approximately 40  
13 hours.

14          6.       Although my own losses in this case were small when compared to the overall settlement  
15 of this matter, I believed in this case and have been dedicated in putting my time and energy to benefit  
16 the Class and all Hyundai customers.

17          7.       I have fully discussed with my attorneys the plaintiffs' motion for attorneys fees and  
18 costs, and I support and approve Class Counsel's motion and believe that their work merit the fees and  
19 costs requested in the motion.

20               I declare under penalty of perjury under the laws of the United States of America that the  
21 foregoing is true and correct. Executed this 22nd day of December 2014, in Los Angeles, California.

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Lillian E. Levoff