

EXHIBIT 14

1 GLANCY BINKOW & GOLDBERG LLP

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10 Submitted on Behalf of: Plaintiffs Laura S. Sutta and Jeffrey Hathaway

11 Counsel for Plaintiff(s) in: Case No. 13-cv-00417

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14
15 IN RE: HYUNDAI AND KIA FUEL
16 ECONOMY LITIGATION

Case No. 2:13-ml-02424-GW-FFM

17 **DECLARATION OF MARC L.**
18 **GODINO IN SUPPORT OF**
19 **REQUEST FOR ATTORNEYS' FEES**
20 **AND EXPENSES**

1 I, Marc I. Godino, declare as follows:

2 1. I am a partner at Glancy Binkow & Goldberg LLP, counsel for Laura S.
3 Sutta and Jeffrey Hathaway. This declaration is submitted in support of the fees and
4 expenses request for work performed by Glancy Binkow & Goldberg LLP in connection
5 with this litigation. I have personal knowledge of the facts below and, if called upon to
6 do so, could and would testify competently thereto. This declaration is submitted after a
7 review of the billing records of Glancy Binkow & Goldberg LLP.

8 **I. OVERVIEW**

9 **A. Overview of Work Performed**

10 Both before and after this case was filed, my firm spent a considerable amount of
11 time investigating the legal and factual underpinnings of this case, including extensive
12 legal analysis and investigation into all potential causes of action arising from the
13 Defendant's conduct. It was also necessary to research and analyze the viability of
14 certifying a nationwide or multi-state class under Federal Rule of Civil Procedure 23.
15 My firm performed the following work, during the litigation as counsel for Plaintiffs:
16 client intake, investigated the facts underlying the litigation, researched applicable law,
17 drafted pleadings, reviewed and revised pleadings, reviewed the preliminary and final
18 settlement process, and participated in various conferences with co-counsel regarding
19 aspects of the case.
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21 **B. Requested Lodestar**

22 2. As set forth below, Glancy Binkow & Goldberg LLP, counsel for Laura S.
23 Sutta and Jeffrey Hathaway, have a total lodestar of \$22,836.25, which is based on 50.25
24 hours.

25 3. Through the assistance of the mediator, the Honorable Stephen J. Sundvold
26 (Ret.), Glancy Binkow accepted Defendant's offer of \$5,000.00 as compensation for
27 Glancy Binkow & Goldberg's total lodestar and expenses.
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1 4. Below is a summary of all of the individuals who worked on this matter,
2 their role (Sr. Partner, Sr. Associate, Paralegal, Litigation Staff), the total number of
3 hours they worked on this matter for which compensation is requested, their hourly
4 billing rate, and their total lodestar.

Name	Role	Total Hours	Billing Rate	Lodestar
Marc L. Godino	Senior Partner	22	\$595	\$13,090
Casey Sadler	Senior Associate	15.75	\$395	\$6221.25
Harry Kharadjian	Paralegal	10.50	\$290	\$3,045.00
Devanshi Patel	Litigation Staff	2	\$240	\$480.00
TOTALS		50.25		\$22,836.25

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13 **II. LODESTAR BY TYPE OF WORK**

14 5. The below divides the total lodestar listed above into distinct categories.

15 **A. Time Spent Preparing Complaint(s), Litigating Actions Outside of the**
16 **MDL, Appearing Before the Judicial Panel of Multidistrict Litigation,**
17 **and other Time Before February 14, 2013**

18 6. This category includes all time spent before the initial status conference
19 before Judge Wu, which occurred on February 14, 2013. Specifically, this time includes
20 client intake, researching the factual and legal issues underlying the complaint, drafting
21 the initial complaint, finalizing and filing the initial complaint, and serving the initial
22 complaint.

23 7. Below is a list of the attorneys who worked on this portion of the litigation,
24 along with the number of hours each spent, their billing rates, the lodestar attributable to
25 them, and the total lodestar for this portion of the litigation.

Name	Total Hours	Billing Rate	Lodestar
Marc L. Godino	17.00	\$595	\$10,115.00
Casey Sadler	15.75	\$395	\$6221.25
Harry Kharadjian	10.50	\$290	\$3,045.00
Devanshi Patel	2	\$240	\$480.00
TOTALS	45.25		\$19,861.25

B. Calls with Non-Settling Plaintiff Group

8. This category includes conference calls with the Non-Settling Plaintiffs that were organized by Liaison Counsel. These hours also reflect time spent on various calls and communication with Liaison counsel regarding the Plaintiffs’ position on the proposed settlement

9. Below is the attorney who worked on this portion of the litigation, along with the number of hours spent, his billing rate, the lodestar attributable to them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Marc L. Godino	1	\$595	\$595.00
TOTALS	1	\$595	\$595.00

C. Review and Discussion of Settlement Terms and Revisions

10. This category includes time spent reviewing and discussing the terms of the proposed settlement, including the following tasks:

- a. Review of the initial Term Sheet, distributed in February 2013.

- b. Review of Liaison Counsel’s December 20, 2013 memo, which described how the discovery related to the strengths and weaknesses of plaintiffs’ claims.
- c. Review of the proposed settlement filed December 23, 2013 and the two Addendums, filed January 16, 2014, and May 2, 2014. This includes discussions and correspondence with Non-Settling Plaintiffs regarding the settlement, the settlement negotiations conducted by Liaison Counsel, and the revisions to the settlement. It also includes the review of settlement-related memos and summaries distributed to Non-Settling Plaintiffs after the settlement was filed on December 23, 2013.
- d. Time spent preparing position statements for Liaison Counsel’s January 30 and May 30 Reports.

11. Below is a list of the attorneys who worked on this portion of the litigation, along with the number of hours each spent, their billing rates, the lodestar attributable to them, and the total lodestar for this portion of the litigation.

Attorney	Total Hours	Billing Rate	Lodestar
Marc L. Godino	4	\$595	\$2380.00
TOTALS	4	\$595	\$2380.00

1 **III. THE REQUESTED HOURLY RATES ARE REASONABLE**

2 11. Glancy Binkow & Goldberg’s hourly rates are in accord with the Laffey
3 Matrix and have been approved by various courts in awarding attorneys’ fees pursuant to
4 class action settlements.

5 **IV. LITIGATION EXPENSES**

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Expense Category	Amount
Postage	\$6.11
Court Filing/Attorney Service Fees	\$1,983.21
Research and Investigation Services	\$33.00
TOTAL	\$2,022.32

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13 I declare under penalty of perjury under the laws of the United States of America
14 that the foregoing is true and correct. Executed on December 23, 2014, at Los Angeles,
15 California.

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17 s/ Marc L. Godino

18 Marc L. Godino

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