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

IN RE CLEARSPRING  
FLASH COOKIE LITIG.

Case No. 2:10-cv-05948-GW  
Case No. 2:10-cv-05484-GW

IN RE QUANTCAST  
ADVERTISING COOKIE LITIG.

**DECLARATION OF MAJED  
NACHAWATI**

7 I, Majed Nachawati, declare as follows:

8 1. I am an attorney-at-law duly licensed to practice before all of the courts of the  
9 State of Texas. I am a managing partner in the law firm of Fears Nachawati. I am the attorney  
10 primarily responsible for the handling of this litigation on behalf of Fears Nachawati. I am co-  
11 counsel for David Rona in the matter of *Rona v. Clearspring Technologies*, No. 2:10-cv-07786-  
12 GW -JCG (C.D. Cal. Filed Oct 18, 2010) and now, in this action ("Clearspring Litigation"). I  
13 am also co-counsel for Alejandro Godoy in the matter of *Godoy v. Quantcast.*, No. 2:10-cv-  
14 07662-GW -JCG (C.D. Cal. filed Oct. 13, 2010) and now, in this action ("Quantcast  
15 Litigation"). I have actively participated in the above-referenced litigations since their inception  
16 and am fully familiar with those proceedings as well as the proceedings currently pending to  
17 resolve this matter. I make this declaration based upon my own personal knowledge. If called to  
18 testify, I could and would testify to the facts contained herein. I am competent to testify that the  
19 following facts are true and correct to the best of my knowledge.

20 2. In the course of representing the above-identified Plaintiffs in the these  
21 litigations, our law firm, as well as the law firm of Wilson Trosclair & Lovins, PLLC ("WTL  
22 Firm"), committed attorney and staff time to thoroughly investigate the claims against  
23 Defendants prior to filing the lawsuit. This time included consultation with various experts as  
24 well as a review of Defendants' actions and relevant case law. Our law firm, as well as the  
25 WTL Firm committed attorney and staff time to preparing the initial complaint on behalf of the  
26 above-referenced clients and in preparing the consolidated Complaint in these actions, of which  
27 these Plaintiffs' claims are a part.  
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1           3.       Throughout my firm's involvement in these litigations, we ensured that the tasks  
2 necessary to prosecute the case were allocated among counsel appropriately and were conducted  
3 efficiently, without undue duplication of effort, and at minimal expense. Not being paid by the  
4 hour, we had an incentive to conduct our efforts in an efficient manner. Similarly, as our firm  
5 and WTL Firm were responsible for advancing all expenses, we had an incentive not to expend  
6 funds unnecessarily.

7           4.       As of April 15, 2011, the total number of hours spent by the attorneys and  
8 support staff in my firm on the **Clearspring Litigation** is 65. These hours were incurred at the  
9 direction of my law firm. The total combined lodestar amount, based on current hourly rates, is  
10 \$22,750. This figure is based on the rates my firm charges in litigation matters. My staff time  
11 is billed at \$75 per hour, which is based on current hourly rates. We account for expenses  
12 separately, which are not duplicated in our professional billing rates. The attorney and support  
13 staff fees expended by my firm are as follows:  
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16 <b>ATTORNEY</b>	17 <b>YEARS OF PRACTICE</b>	18 <b>HOURS</b>	19 <b>HOURLY RATE</b>	20 <b>TOTAL</b>
21           Majed Nachawati	22           7	23           65	24           \$350	25           \$22,750
26           Total		27           65		28           \$22,750

21           5.       As of April 15, 2011, the total number of hours spent by the attorneys and  
22 support staff in my firm on the **Quantcast Litigation** is 39. These hours were incurred at the  
23 direction of my law firm. The total combined lodestar amount, based on current hourly rates, is  
24 \$13,650. This figure is based on the rates my firm charges in litigation matters. We account for  
25 expenses separately, which are not duplicated in our professional billing rates. The attorney and  
26 support staff fees expended by my firm are as follows:  
27  
28


ATTORNEY	YEARS OF PRACTICE	HOURS	HOURLY RATE	TOTAL
Majed Nachawati	7	39	\$350	\$13,650
Total		39		\$13,650

6. The total combined lodestar amount for the two above-referenced litigations is \$36,400.

7. My Firm's total expenses for the two above-referenced litigations is \$4,337.73

8. A copy of my Firm's resume is attached hereto as Exhibit A.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
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Majed Nachawati

4/19/11  
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