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

IN RE CLEARSPRING
FLASH COOKIE LITIG.

IN RE QUANTCAST
ADVERTISING COOKIE LITIG.

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

**DECLARATION OF JEREMY
WILSON**

I, Jeremy R. Wilson, declare as follows:

1. I am an attorney-at-law duly licensed to practice before all of the courts of the States of Texas, Florida and Arkansas. I am also admitted to practice before the United States Courts of Appeals for the Fifth, Eleventh, and Ninth Circuits and United States District Courts for the Northern and Eastern District of Texas and the Southern District of Florida. I am a managing member of Wilson, Trosclair & Lovins, PLLC (“WTL Firm”). I am the attorney primarily responsible for the handling of the above-styled litigations on behalf of WTL Firm. I am co-counsel for David Rona in the matter of *Rona v. Clearspring Technologies*, No. 2:10-cv-07786-GW –JCG (C.D. Cal. Filed Oct 18, 2010) and now, in this action (“Clearspring Litigation”). I am also co-counsel for Alejandro Godoy in the matter of *Godoy v. Quantcast.*, No. 2:10-cv-07662-GW -JCG (C.D. Cal. filed Oct. 13, 2010) and now, in this action (“Quantcast Litigation”). I have actively participated in the above-referenced litigations since their inception and am fully familiar with those proceedings as well as the proceedings currently pending to resolve this matter. I make this declaration based upon my own personal knowledge. If called to testify, I could and would testify to the facts contained herein. I am competent to testify that the following facts are true and correct to the best of my knowledge.

2. In the course of representing the above-identified Plaintiff, our law firm, as well as the law firm of Fears Nachawati, committed attorney and staff time to thoroughly investigate the claims against Defendants prior to filing the lawsuit. This time included consultation with various experts as well as a review of Defendants’ actions and relevant case law. Our law firm,

1 as well as the law firm of Fears Nachawati also committed attorney and staff time to preparing
2 the initial complaint on behalf of the above-referenced clients and in preparing the consolidated
3 Complaint in this action, of which these Plaintiffs' claims are a part.

4 3. Throughout my firm's and Fears Nachawati's involvement in this litigation, we
5 ensured that the tasks necessary to prosecute the case were allocated among counsel
6 appropriately and were conducted efficiently, without undue duplication of effort, and at
7 minimal expense. Not being paid by the hour, we had an incentive to conduct our efforts in an
8 efficient manner. Similarly, as our firm and the firm of Fears Nachawati were responsible for
9 advancing all expenses, we had an incentive not to expend funds unnecessarily.

10 4. As of April 15, 2011, the total number of hours spent by the attorneys in my firm
11 on the **Clearspring Litigation** is 20. The total combined lodestar amount, based on current
12 hourly rates, is \$8,700. This figure is based on the rates my firm charges in litigation matters.
13 We account for expenses separately, which are not duplicated in our professional billing rates.
14 The attorney and support staff fees expended by my firm are as follows:

16 ATTORNEY	17 YEARS OF PRACTICE	18 HOURS	19 HOURLY RATE	20 TOTAL
21 Jeremy R. Wilson	11	16	\$445	\$7,120
Kenneth Trosclair	10	4	\$395	\$1,580
Total				\$8,750

22 5. As of April 15, 2011, the total number of hours spent by the attorneys and
23 support staff in my firm on the **Quantcast Litigation** is 19. The total combined lodestar
24 amount, based on current hourly rates, is \$8,205. This figure is based on the rates my firm
25 charges in litigation matters. We account for expenses separately, which are not duplicated in
26 our professional billing rates. The attorney and support staff fees expended by my firm are as
27 follows:

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ATTORNEY	YEARS OF PRACTICE	HOURS	HOURLY RATE	TOTAL
Jeremy R. Wilson	11	14	\$445	\$6,230
Kenneth Trosclair	10	5	\$395	\$1,975
Total				\$8,205

6. The total combined lodestar amount for the two above-referenced litigations is \$16,955.

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

8. A copy of the Declaration of Majed Nachawati of Fears Nachawati is attached hereto as Exhibit B.

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

