

**Invitation for proposals to serve as class counsel in *Mercedes Guerrero, et al. v. Wells Fargo Bank, N.A.*, No. 12-4026-WHA. Deadline July 19, 2013.**

In the above-captioned case, the district court has conditionally certified a class of California borrowers in connection with their claims against Wells Fargo Bank, N.A. for alleged practices concerning force-placement of flood insurance. The district court seeks applications from qualified counsel to serve as class counsel.

The application should explain the experience of counsel in handling class actions and other complex litigation, trials, and the types of claims asserted in this action, as well as counsel's track record in achieving class verdicts and/or settlements. For prior class settlements within at least the last five years, counsel shall state the total cash actually paid out to class members (net of all fees and expenses) and disclose the cash paid to counsel as attorney's fees and expenses. Positive or negative comments by other judges on counsel's performance will also be given weight. The application should describe the proposed staffing, including the identity and qualifications of the lead attorney(s) who will perform the actual work for the class. Information regarding the proposed fee structure and expenses should also be included. Applicants should check for conflicts of interest before applying.

Applications must be lodged for the Court's review by **July 19, 2013**. Two copies should be lodged with the Clerk's office in compliance with Civil Local Rule 1-5(m). Although the applications will be maintained under seal for the time being, applicants should be aware that circumstances may require disclosure to other applicants, as well as to plaintiff and class members.

Further information can be found on the electronic case docket for this action, available at <http://www.cand.uscourts.gov/cm-ecf> or at [www.pacer.gov](http://www.pacer.gov).