

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

Case No. 1:10-cv-23235/HOEVELER

DAVID KARDONICK, individually and on behalf
of all others similarly situated and the general public,

Plaintiff,

v.

JPMORGAN CHASE & CO. and CHASE BANK
USA, N.A.

Defendants.

DECLARATION OF ROBERT D. WICK

Robert D. Wick hereby declares as follows:

1. I am a partner at Covington & Burling LLP, counsel for Chase Bank USA, N.A. ("Chase"). I submit this declaration in support of Chase's Motion For Show Cause Order.

2. Attached as Exhibit A to this Declaration is a true and correct copy of the Complaint filed in *State of West Virginia ex rel. McGraw v. JPMorgan Chase & Co. et al.*, Civil Action No. 11-C-94-N (W. Va. Cir. Ct. filed Aug. 16, 2011).

3. Attached as Exhibit B to this Declaration is a true and correct copy of the Complaint filed in *State of Hawaii ex rel. Louie v. JPMorgan Chase & Co. et al.*, Civil Action No. 12-10985-04 (Haw. Cir. Ct. filed Apr. 12, 2012).


4. Attached as Exhibit C to this Declaration is a true and correct copy of the First Amended Complaint filed in *State of Mississippi ex rel. Hood v. JPMorgan Chase & Co. et al.*, Civil Action No. G2012-1085 T/1 (Miss. Chancery Ct. filed Aug. 6, 2012).

5. Pursuant to Local Rule 7.1(a)(3), I wrote to Respondents Baron & Budd, P.C. and Golomb & Honik, P.C. on September 20, 2012. My letter is attached hereto as Exhibit D. It asked those firms to cease violating the injunction contained in the final approval order entered in this action and attached an additional copy of that order. The letter also offered to discuss the matter by telephone if either firm was interested. On September 25, 2012, I received a response from Laura Baughmann of Baron & Budd, indicating that Baron & Budd does not intend to cease the conduct that Chase contends is violating this Court's injunction. Ms. Baughmann's letter is attached hereto as Exhibit E. Ms. Baughmann's letter was copied by e-mail to Richard Golomb of Golomb & Honik. I received no separate response from Golomb & Honik.

6. Attached as Exhibit F is a true and correct copy of the court's decision in *Mitchell v. Securities Am., Inc.*, No. 11-cv-01948-F (N.D. Tex. Feb. 13, 2012) (Dkt. #22).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 25, 2012


Robert D. Wick