

EXHIBIT 24

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7 Submitted on Behalf of:

8 MLG Automotive Law, APLC

9 Counsel for Plaintiff(s) in:

10
11 Herbert J. Young v. Kia Motors America, Inc., et al. (2:13-cv-00167-GW-FFM)

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 JONATHAN A.**
18 **MICHAELS IN SUPPORT OF**
19 **REQUEST FOR ATTORNEYS' FEES**
20 **AND EXPENSES**

21 Date: December 23, 2014

1 I, Jonathan A. Michaels, Esq., declare as follows:

2 1. I am the Founding Member at MLG Automotive Law, APLC, counsel for
3 Plaintiffs, Herbert J. Young, et al. in the above-captioned case. This declaration is
4 submitted in support of the fees and expenses request for work performed by MLG
5 Automotive Law, APLC in connection with this litigation. I have personal knowledge of
6 the facts below and, if called upon to do so, could and would testify competently thereto.
7 This declaration is submitted after a review of the billing records of MLG Automotive
8 Law, APLC.

9 **I. OVERVIEW**

10 **A. Overview of Work Performed**

11 2. MLG Automotive Law, APLC (formerly Michaels Law Group, APLC) is
12 counsel to the Plaintiffs in the above captioned case. That case was originally filed in the
13 United States District Court for the Central District of California in Santa Ana, CA on
14 January 9, 2013. The JPML transferred this case for consolidated and coordinated
15 activity on February 5, 2013. MLG Automotive Law, APLC was, at all times, an active
16 participant in this litigation, contributing its skill and expertise through its performance of
17 many and varied tasks, as detailed below.

18 **B. Requested Lodestar**

19 3. Plaintiffs, Herbert J. Young, et al. in the above-captioned case, incurred a
20 total lodestar of \$5,932.00 in fees, which is based on 20.88 hours, for their counsel MLG
21 Automotive Law, APLC. Nevertheless, the parties reached an agreement for MLG
22 Automotive Law, APLC, to reduce its fees to \$2,500.00.

23 4. Below is a summary of all of the individuals who worked on this matter,
24 their role (Founding Member, Sr. Associate, Jr. Associate, Litigation Staff), the total
25 number of hours they worked on this matter for which compensation is requested, their
26 hourly billing rate, and their total lodestar.

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Attorney	Role	Total Hours	Billing Rate	Lodestar
Jonathan A. Michaels	Founding Member	5.10	450.00/hr.	\$2295.00
Matthew S. Grayson	Senior Associate	3.00	315.00/hr.	\$945.00
Lisa S. Inouye	Junior Associate	6.20	265.00/hr.	\$1,643.00
Valerie Vasquez	Senior Associate	0.40	305.00/hr.	\$122.00
Ian C. Deady	Litigation Staff	5.68	150.00/hr.	\$915.00
Kendra Conger	Litigation Staff	0.50	150.00/hr.	\$75.00
TOTALS		20.88		\$5,932.00

5. As needed.

II. LODESTAR BY TYPE OF WORK

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

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

7. This category includes all time spent before the initial status conference before Judge Wu, which occurred on February 14, 2013. It also includes any time spent after February 14, 2013, preparing and filing complaints, litigating those cases outside of the MDL proceedings, and appearing before the Judicial Panel on Multidistrict Litigation.

8. 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
Jonathan A. Michaels, Esq.	5.00	\$450.00	\$2,250.00
Lisa S. Inouye, Esq.	5.35	\$265.00	\$1,417.75
Ian C. Deady	5.68	\$150.00	\$852.00
Kendra Conger	0.50	\$150.00	\$75.00
TOTALS	16.53		\$4,594.75

9. Research, prepare and file Complaint; communications with client(s).

B. Court Hearings in the MDL

10. This category includes all hearings with Judge Wu (attended in person or telephonically) in MDL 2424. The first hearing was on February 14, 2013.

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
Lisa S. Inouye, Esq.	0.85	\$265.00	\$225.25
TOTALS	0.85		\$225.25

12. Review and analyze transfer to MDL; status updates.

C. Calls with Non-Settling Plaintiff Group

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

- a. Review the initial Term Sheet, distributed in February 2013;
- b. Review of Liason 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 Liason 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 spend preparing position statements for Liason Counsel's January 30 and May 30 reports.

14. 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
Matthew S. Grayson, Esq.	1.25	\$315.00	\$393.75
Valerie Vasquez, Esq.	0.40	\$305.00	\$122.00
TOTALS	1.65		\$515.75

15. Review and discussion of settlement terms.

D. Other

16. This category includes any hours not included in the above categories for which attorneys' fees are sought.

17. 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
Jonathan A. Michaels, Esq.	0.10	\$450.00	\$45.00

Matthew S. Grayson, Esq.	1.75	\$315.00	\$551.25
TOTALS	1.85		\$596.25

18. Prepare for Fee Mediation.

III. LITIGATION EXPENSES

Expense Category	Amount
Electronic Research	\$1.66
Service/Filing Fees	\$541.40
Copying	\$11.10
Interest	\$765.42

19. Court fees and miscellaneous expenses; interest per Aged Invoice Listing.

IV. THE REQUESTED HOURLY RATES ARE REASONABLE

These are the standard rates typically charged by our firm and paid by our clients for each designated category. Plaintiffs, Herbert J. Young, et al. in the above-captioned case, incurred a total lodestar of \$5,932.00 in fees, which is based on 20.88 hours, for their counsel MLG Automotive Law, APLC. Nevertheless, the parties reached an agreement for MLG Automotive Law, APLC, to reduce its fees to \$2,500.00.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed December 23, 2014 at Newport Beach, California.


