

# EXHIBIT 22

**LAW OFFICES OF TODD M. FRIEDMAN, P.C.**

Todd M. Friedman (SBN 216752)  
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*Attorneys for Plaintiffs,*

Submitted on Behalf of:

**LAW OFFICES OF TODD M. FRIEDMAN, P.C.**

Counsel for Plaintiff(s) in:

Bayard, Leslie, and Medina, Nomer v. Hyundai and Kia

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

IN RE: HYUNDAI AND KIA FUEL  
ECONOMY LITIGATION

Case No. 2:13-ml-02424-GW-FFM

**DECLARATION OF SUREN N.  
WEERASURIYA IN SUPPORT OF  
REQUEST FOR ATTORNEYS' FEES  
AND EXPENSES**

Date: December 21, 2014

1 I, Suren N. Weerasuriya, declare as follows:

2 1. I am an associate at Law Offices of Todd M. Friedman, co-counsel for  
3 Leslie Bayard and Nomer Medina. This declaration is submitted in support of the fees  
4 and expenses request for work performed by Law Offices of Todd M. Friedman, P.C. in  
5 connection with this litigation. I have personal knowledge of the facts below and, if  
6 called upon to do so, could and would testify competently thereto. This declaration is  
7 submitted after a review of the billing records of Law Offices of Todd M. Friedman, P.C.

8 **I. OVERVIEW**

9 2. I was one of Plaintiffs' attorneys. I reviewed multiple motions and reports; I  
10 also attended numerous conference calls. My time performed on this case is as follows:

- 11 **a.** Prepare and file State Class Action Compliant- 1.80 Hours at \$250.00  
12 rate= \$450.00 lodestar total
- 13 **b.** Prepare and file First Amended Complaint- .50 hours at \$250.00 rate=  
14 \$125.00
- 15 **c.** Status Conference- April 25, 2013- .5 hours
- 16 **d.** Status Conference- August 15, 2013- 1.5 hours
- 17 **e.** Conference Call Regarding Discovery- May 08, 2013- .5 hours  
18 \$250.00= \$125.00
- 19 **f.** Conference Call Regarding Discovery/Settlement- May 22, 2013-  
20 1.50 hours x \$250.00= \$375.00
- 21 **g.** Conference Call Regarding Discovery/ Settlement- June 03, 2013- .8  
22 hours x \$250.00= \$200.00 hours
- 23 **h.** Conference Call Regarding Discovery/ Settlement- January 03, 2014-  
24 1.3 hours x \$250.00= \$325.00
- 25 **i.** Review Settling Plaintiffs' Motion for Preliminary Approval of Class  
26 Settlement- December 27, 2013- 5.10 hours x \$250.00= \$1,275.00
- 27 **j.** Review Settling Plaintiff's Motion for Class Certification- December  
28 28, 2013- 3.8 hours x \$250.00= \$950.00

- k. Prepare memorandum regarding Motion for Class Certification and Motion for Preliminary Approval of Class Settlement- December 30, 2013- 1.0 hours x \$250.00= \$250.00
- l. Conference Call regarding Settling Plaintiffs' Motion- January 03, 2014- 1.3 hours x \$250.00= \$325.00
- m. Review Joint Discovery Motion and advise co-counsel- December 02, 2013- 1.60 hours x \$250.00= \$400.00
- n. Read Judge Wu's Discovery Order and report back to co-counsel- December 11, 2013-1.7 hours x \$250.00= \$425.00

II. THE REQUESTED HOURLY RATES ARE REASONABLE

My experience and three and one-half years practicing in California as a consumer rights attorney are sufficient to justify my hourly billing rate in this case of \$250 per hour. Since joining the Law Offices of Todd M. Friedman, P.C. in April of 2012, I have been actively involved in litigating cases brought under the Rosenthal Fair Debt Collection Practices Act, the Federal Fair Debt Collection Practices Act, The California Labor Code, The Fair Employment and Housing Act, the Song-Beverly Consumer Warranty Act, the Federal Magnuson-Moss Warranty Act, and the Consumer Legal Remedies Act. I have acted as lead or co-counsel in the litigation of hundreds of cases under these statutes, and have successfully prosecuted my clients' claims through Arbitration and Trial. I have also acted as secondary counsel on at least fifty, if not more, class action lawsuits involving a variety of consumer statutes.

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1 I declare under penalty of perjury under the laws of the United States of America  
2 that the foregoing is true and correct. Signed on December 22, 2014 in Irvine, California.

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5 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**

6 By: /s/ Suren N. Weerasuriya  
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