

IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR THE COUNTY OF KING

RICHARD EASTER and TRISTEN STAR,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

SOUND GENERATIONS,

Defendant.

No. 21-2-16953-4 SEA

DECLARATION OF ALEXANDER F.
STRONG IN SUPPORT OF PLAINTIFFS’
MOTION FOR ATTORNEY FEES,
EXPENSES, AND SERVICE AWARDS

I, Alexander F. Strong, hereby declare as follows:

1. I am over 18 years of age, I have personal knowledge of the facts stated herein, and I am competent to testify. I am co-counsel for Plaintiffs in this action. I am an attorney for Bendich, Stobaugh & Strong, P.C. (“BSS”) and a member in good standing of the bars of the state of Washington, Oregon, Alaska, and Idaho. This Declaration is submitted in Support of Plaintiffs’ Motion for Attorneys’ Fees, Expenses, and Service Awards.

2. A summary of rates and hours expended by BSS’s professionals, as of May 15, 2023, is set forth as follows:

Name	Title	Billable Rate	Billable Hours	Lodestar
Alexander Strong	Attorney	\$650.00	12.4	\$8,060.00
Anders Forsgaard	Paralegal	\$250.00	3.2	\$800.00
Claire Falteseck	Paralegal	\$250.00	3.4	\$850.00
Erika Haack	Paralegal	\$250.00	2.1	\$525.00
		TOTAL	21.1	\$10,235.00

3. I am an experienced class action litigator. Since 2015, I have been one of class counsel in the following certified class actions:

- *Fowler v. Guerin*, 899 F.3d 1112 (2018) (action by teachers for interest on retirement accounts);
- *Moore v. Health Care Authority*, 181 Wn.2d 299 (2014) (action by part-time state employees to obtain health benefits);
- *Dolan v. King County*, 172 Wn.2d 299 (2013) (action by public defenders to obtain employee status and pension benefits);
- *Merritt v. King County*, King County Cause No. 18-2-05070-7 SEA (action by paramedics to obtain pension benefits for time employed during training);
- *Lundquist v. Seattle School District No. 1*, King County No. 19-2-02607-3 SEA (2019 WL 7483935 (2019)) (action by disabled school employees for disability benefits);
- *Rush v. State of Washington*, King County No. 20-2-03771-1 (action seeking pro rata sick leave for part-time faculty);
- *Rush v. State of Washington*, King County No. 21-2-04314-0 SEA (action seeking retirement benefits for part-time faculty).

4. BSS's fee records accurately reflect work actually, reasonably, and necessarily performed in connection with the litigation of this matter.

5. To date, BSS has incurred \$37.98 of litigation expenses, as follows:

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Description	Amount
Filing Fees	\$37.98

6. BSS will continue to expend attorney time and resources given the future work still needed for completion of the Settlement.

Dated this 15th day of May 2023.

By: /s/ Alexander F. Strong
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