

THE HONORABLE RICHARD A. JONES  
(On Reference to the Honorable S. Kate Vaughn)

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

CHRIS HUNICHEN, individually and on  
behalf of all others similarly situated,

*Plaintiff,*

v.

ATONOMI LLC, a Delaware LLC, CENTRI  
TECHNOLOGY, INC., a Delaware  
Corporation, VAUGHAN EMERY, DAVID  
FRAGALE, ROB STRICKLAND, DON  
DELOACH, WAYNE WISEHART, WOODY  
BENSON, MICHAEL MACKEY, and JAMES  
SALTER,

*Defendants.*

ATONOMI LLC, a Delaware LLC,

*Counterclaimant,*

v.

CHRIS HUNICHEN,

*Counter-Defendant.*

ATONOMI LLC, a Delaware LLC,

*Third Party Plaintiff,*

v.

DAVID PATRICK PETERS, SEAN  
GETZWILLER, DAVID CUTLER, CHANCE  
KORNUTH, and DENNIS SAMUEL  
BLIEDEN,

*Counter-Defendants.*

No. 2:19-cv-00615-RAJ-SKV

DECLARATION OF JOEL ARD SUPPORT  
OF CLASS REPRESENTATIVE'S MOTION  
FOR AN AWARD OF ATTORNEYS' FEES  
AND EXPENSES

1 I, Joel B. Ard, Esq., pursuant to 28 U.S.C. § 1746, hereby declare as follows:

2 1. I am admitted to practice law in this Court and the Courts of the State of  
3 Washington. I am the sole member of Ard Law Group PLLC (“ALG”), counsel of record for Class  
4 Representative Chris Hunichen (“Hunichen”), and appointed Class Counsel. I respectfully  
5 submit this declaration in support of the Class Representative’s Motion for an award of fees and  
6 expenses.

7 2. I have personally participated in, overseen, and monitored the prosecution of this  
8 Action, and have otherwise been kept informed of developments in this Litigation. Thus, if called  
9 upon, I can testify to the matters set forth herein.

10 3. My firm has served as co-Class Counsel for the Settlement Class throughout the  
11 course of this litigation.

12 4. As noted in my Declaration of December 13, 2022, I previously spent 1,152 hours  
13 working on this matter, which, at my then-regular hourly rate of \$775, corresponded to a lodestar  
14 of \$892,800.

15 5. This Court’s prior Order awarding fees in connection with the Partial Settlement  
16 resulted in ALG recouping approximately 75% of ALG’s total lodestar.

17 6. Since December 2022, I have spent an additional 110.3 hours working on this  
18 matter, which, at my current regular hourly rate of \$850, corresponds to a lodestar of \$93,755. This  
19 summary was prepared from contemporaneous, daily time records I regularly prepare and  
20 maintain. The hours and lodestar amount were for the benefit of the certified Class.

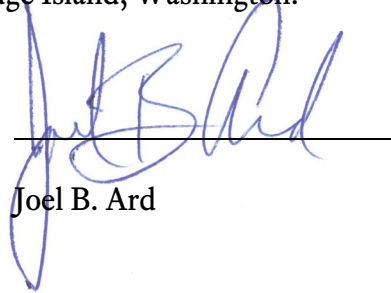
21 7. Ard Law Group has also reimbursed JND Class Action Administration, the Court-  
22 appointed administrator in this matter, for \$9,397.50 in costs for class notice and administration as  
23 required by this Court’s class certification Order (Dkt No. 246), and in giving notice of the  
24 Preliminary Approval of this settlement. These costs are separate from notice and administration  
25 costs incurred in connection with the earlier Partial Settlement, and relate only to the separate  
26 Litigation Class, now the subject of this settlement.

1 8. I have reviewed the time and expenses reported by Ard Law Group in this Action  
2 which are included in this declaration and exhibits, and I affirm they are true and accurate.

3 I declare under penalty of perjury under the laws of the United States of America that the  
4 forgoing is true and correct.

5 Executed on the 7th day of March, 2024 at Bainbridge Island, Washington.

6  
7 By:



8 Joel B. Ard  
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