

**DECLARATION OF DANIEL WOLF VERIFYING OUT-OF-POCKET EXPENSES,  
HOURLY RATES AND HOURS EXPENDED PURSUANT TO ORDER  
PRELININARILY APPROVING SETTLEMENT**

I, DANIEL WOLF, declare that:

1. I am one of the counsel for plaintiffs in the “TV Writers Cases”. I submit this declaration in support of Class Counsel’s common request for reimbursement of expenses and a unified award from the Legal and Administrative Expense portion of QSFII in the pending settlement of 19 of the TV Writers Cases.

***Background and Experience***

2. As set forth in my resume (attached hereto as Exhibit A), I graduated *magna cum laude* from the University of Michigan Law School in 1986. For the next two years, I served as an attorney adviser at the Office of the Legal Adviser within the U.S. Department of State. In 1989, I joined the Washington, D.C. Office of Hughes Hubbard & Reed, LLP (“HHR”), where I worked until 2000 and where I ultimately became a full equity partner. In 2001, I joined Sprenger & Lang, P.L.L.C. (“SL”), as a partner in its Washington, D.C. office. After leaving SL in 2005, I formed my own office – Law Offices of Daniel Wolf.

3. During the course of my career, I have been involved in the litigation of numerous complex commercial and class action lawsuits. I have appeared and argued before a wide range of trial and appellate courts, including the U.S Supreme Court, the U.S. Courts of Appeals for the D.C., Third, Fifth and Ninth Circuits, and the California Court of Appeal.

4. During the time I was at HHR, I played a significant role in the defense of a number of major class action lawsuits, including *In re Phar-Mor, Inc. Sec. Litigation*, No. 92-1938 (W.D. Pa.), and *Balentine v. Union Mortgage*, No. 91-C-8213 (N.D. Ill.), both of which involved allegations of large scale commercial fraud. In addition, I spearheaded the prosecution

of *Legal Assistance for Vietnamese Asylum Seekers ("LAVAS"), v. United States Department of State, Bureau of Consular Affairs*, No. 94-0361 (D.D.C.), a lawsuit challenging discriminatory visa processing procedures brought on behalf of a class of Vietnamese visa applicants and their U.S. sponsors. My participation in *LAVAS* included oral argument in the U.S. Supreme Court and two oral arguments in the D.C. Circuit.

5. During the five years I worked at SL and the five years since I started my own office, my practice has been devoted exclusively to the prosecution of multi-plaintiff and class action lawsuits. Apart from my involvement in these 23 actions, which was extensive, I have devoted the great bulk of my legal practice during that period to three sets of cases.

6. First, I served as lead counsel in *Hill v. Republic of Iraq*, No. 99-3346 (D.D.C.), and continue to serve as lead counsel in *Vine v. Republic of Iraq*, No. 01-02674 (D.D.C.), two lawsuits under the Foreign Sovereign Immunities Act ("FSIA") that I brought on behalf of a total of 420 American citizens, alleging that they and/or their spouses had been taken hostage by the former Iraqi regime in violation of international law following its invasion of Kuwait in August 1990. In *Hill*, I obtained judgments on behalf of all 180 plaintiffs totaling \$95 million in the aggregate, which were collected in full (*see, e.g., Hill v. Republic of Iraq*, 175 F.Supp.2d 36 (D.D.C. 2001), and *Frazier v. Republic of Iraq*, 2003 U.S. Dist. LEXIS 3725 (D.D.C. Mar. 11, 2003)), and succeeded in reversing on appeal the district court's partial denial of certain plaintiffs' compensatory damages claims (*Hill v. Republic of Iraq*, 328 F.3d 680 (D.C. Cir. 2003)). In *Vine*, I succeeded in defeating Iraq's motion for dismissal on jurisdictional and other grounds (*Vine v. Republic of Iraq*, 459 F. Supp. 2d 10 (D.D.C. 2006)), and have persuaded the State Department to press for a diplomatic resolution of the claims of the *Vine* plaintiffs.

7. Second, while at SL, I developed and subsequently helped orchestrate two employee benefit class actions against the Allstate Insurance Company: (1) *Romero, et al. v. Allstate Insurance Co. ("Romero I")*, No. 01-3894 (E.D. Pa.), a class action lawsuit brought on behalf of 6,200 former and current Allstate agents alleging that Allstate terminated their employment relationship in order to deprive them of retirement benefits in violation of section 510 of ERISA; and (2) *Romero, et al. Allstate Insurance Co. ("Romero II")*, No. 01-6764 (E.D. Pa.), a class action lawsuit brought on behalf of former and current Allstate agents alleging that Allstate amended its retirement plan to cut-back on their early retirement benefits in violation of section 204 of ERISA. Three years ago, I successfully argued the appeal of the district court's ruling dismissing *Romero II* on statute of limitations grounds. *Romero v. Allstate Insurance Co. ("Romero II")*, 404 F.3d 212 (3d Cir. 2007). Since that time, I worked with SL to achieve a reversal of both a district court order dismissing *Romero II* on different grounds and a district court order granting a motion for summary judgment in *Romero I*.

8. Third, commencing in approximately June 2005, I conceptualized and developed a set of class action lawsuits against the three major credit reporting agencies for employing practices that resulted in the systemic misreporting of delinquent pre-bankruptcy debts as still due and owing in violation of the Fair Credit Reporting Act. *White v. Experian Information Solutions, Inc.*, No. 015-1070 (C.D. Cal.) and related cases. I have since played a vital role in orchestrating that litigation and procuring an injunctive relief settlement, which required the defendants to completely overhaul their practices for reporting pre-bankruptcy debt. Prior to that settlement, I spearheaded a challenge to a settlement that had been negotiated by another team of lawyers through something akin to a "reverse auction" and succeeded in persuading the court to reject that

settlement as unfair, unreasonable and inadequate. *Acosta v. Trans Union, LLC*, 243 F.R.D. 377 (C.D. Cal. 2007).

***Role In These Cases***

9. My principal role in these cases has involved the formulation, development and preparation of plaintiffs' legal arguments. To this end, I drafted the original and amended complaint that were filed in federal court and contributed substantially to the original and amended complaints that were subsequently filed in state court. During the first six years of this litigation, I authored and did the bulk of the research for the large majority of plaintiffs' briefs on contested motions. I also argued the appeals in both *Alch v. Superior Court* (2004) 122 Cal.App.4th 339 (2004), and *Alch v. Superior Court*, 165 Cal.App.4th 1412 (2008), both of which resulted in the reversal of the trial court's orders.

***Time Expended In These Cases***

10. I have kept contemporaneous records of my time since I first commenced my investigation of this matter in late 1999 until this date. I have provided my detailed time records to a common database of Class Counsel and agree those records are available for in camera review by the Court.

11. I have reviewed my billing records, which are maintained by Sprenger & Lang, PLLC and by the Law Offices of Daniel Wolf. I hereby represent that, from the outset, I have personally expended a total of 5,936 hours on these cases. I make no representations about the hours that have been billed by any other attorneys, paralegals or other legal staff, who might have worked on this matter.

***Historical Billing Rate***

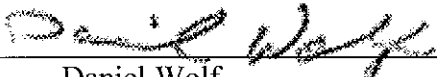
12. At the time I commenced working on this litigation in 1999 and 2000, my billing rate was \$390 per hour – a rate that HHR’s clients did, in fact, regularly pay for my services. In the summer of 2000, HHR increased my billing rate to \$410 per hour. Since that time, I have billed my time only on a contingency basis.

13. Adjusting for inflation in accordance with the consumer price index, my 2000 rate of \$410 per hour would be \$516 per hour in today’s dollars. However, for purposes of determining what should be the current billing rate for my time, the appropriate inflation adjustment is not the general consumer prices index, but rather the legal services component of that index. Under the updated Laffey matrix, which adjusts for that component, the rate for an attorney of my experience is \$686 per hour, which is the rate I am seeking in this case.

14. That rate is a very conservative one for two reasons. First, the \$410 rate, which was my actual billing rate in 2000 in non-contingent cases, was substantially higher than the Laffey rate for that year. Second, I have recently spoken with one of my former senior partners at HHR. He has told me he believes that the partnership would welcome me back and informed me that if I did return I would be billed out at approximately \$800 per hour. Accordingly, applying a \$686 per hour rate for the time I devoted to this case is conservative and more than reasonable.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14 day of April, 2010.

  
\_\_\_\_\_  
Daniel Wolf