

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

---

Barry Sewall, Shamika Gregory, Jerome Gregory,  
Frank Richmond, Michael McDermott, Kelley  
McDermott, Chance Gallo, Sheila Nasilasila,  
Erin Wise, Michael Curran, Christa Curran,  
Latrice Jones-Byrd, LaQuita Dasher, Ayoka  
Durham, Marcus Durham, Donna Sheard,  
Richard Allen, Gabrielle Todd, Gina Johnson,  
and Lionel Johnson each individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

Home Partners Holdings LLC, and OPVHHJV  
LLC, d/b/a Pathlight Property Management,

Defendants.

---

Court File No.: 0:25-CV-7849

**DECLARATION OF ABIGAIL M.  
HINCHCLIFF IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES, REIMBURSEMENT  
OF LITIGATION AND SETTLEMENT  
ADMINISTRATION EXPENSES, AND  
CLASS REPRESENTATIVE SERVICE  
AWARDS**

I, Abigail M. Hinchcliff, declare under oath, as follows:

1. I am a Partner at Olson Grimsley Kawanabe Hinchcliff & Murray LLC ("Olson Grimsley"). I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Litigation and Settlement Administration Expenses, and Class Representative Service Awards.

2. Olson Grimsley represents plaintiffs in high-stakes trials and appeals nationwide and combines experience from both public service and private practice. I have significant experience in Colorado Consumer Protection Act claims, including acting as the First Assistant Attorney General for the Unit at the Colorado Attorney General's Office that enforces the CCPA and prevailing in an appeal to the Colorado Supreme Court on a CCPA case relating to deception by a for-profit college.

3. Both I and attorneys from my firm provided appellate legal services to the Plaintiffs and proposed class representatives in the matters captioned *Curran, et al. v. Home Partners Holdings LLC*,

*et al.*, No. 1:23-cv-01279 (D. Colo.) and *Curran, et al. v. Home Partners Holdings LLC, et al.*, No. 2024SA164 (Colo.).

4. Specifically, after the United States District Court for the District of Colorado determined it believed the *Curran* matter presented novel and important issues of state law necessitating certification of questions to the Colorado Supreme Court, we were retained by Plaintiffs to represent the putative Colorado class in connection with that appellate matter. We assisted in the preparation of appellate briefs and prepared for oral argument in the Colorado Supreme Court, which was postponed after Plaintiffs provided notice of settlement on December 18, 2024.

5. The total number of hours recorded by my firm on this litigation is 127.4 hours. The lodestar for my firm for that same period is \$114,765.00. The hourly rates for the lawyers and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters.

6. I determined my firm's total hours and lodestar by examining time records regularly prepared and maintained by my firm. The table below summarizes the amount of time spent by each partner, associate, and other professional support staff in this litigation, multiplied by their hourly rates. The lodestar calculation is based on my firm's historic hourly billing rates from the inception of this case through October 1, 2025. The following summary indicates the amount of time spent by each attorney and professional support staff in this litigation, multiplied by their hourly rates:

Name	Title	Rate	Hours	Total
Abigail Hinchcliff	Partner	\$1,100.00	57	\$62,700.00
Victoria Suarez-Palomo	Associate	\$750.00	66.5	\$49,875.00
Beth Costner	Paralegal	\$650.00	0.3	\$195.00
Katherine Wright	Paralegal	\$575.00	2.6	\$1,495.00
Nicole Hollingsworth	Paralegal	\$500.00	1.0	\$500.00
<b>TOTAL:</b>			127.4	\$114,765.00

7. My firm has incurred a total of \$39.00 in unreimbursed reasonable and necessary litigation expenses through October 1, 2025, as detailed here:

Date	Description	Amount
10/15/2024	Colorado E-Filing Fee	\$39.00

8. The expenses my firm incurred in this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and represent accurate records of the expenses incurred.

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

Date: October 3, 2025

/s/ Abigail M. Hinchcliff  
Abigail M. Hinchcliff