

**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 ATTORNEY
BRIANNE POWER IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION
AND SETTLEMENT
ADMINISTRATION EXPENSES, AND
CLASS REPRESENTATIVE
SERVICE AWARDS**

I, Brianne Power, declare under oath, as follows:

1. I am an attorney at Towards Justice. 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. Towards Justice is a public interest law firm located in Denver, Colorado dedicated to advancing economic justice through impact litigation and policy advocacy. Towards Justice was founded in response to the high volume of wage theft complaints that were not being addressed in Colorado, but broadened its scope to take on a variety of market abuses affecting working people across the country, including

wage theft, discrimination, fraud, violations of consumer protection statutes, and other unfair and abusive practices. See www.towardsjustice.org.

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 Colorado putative class in connection with that appellate matter. We prepared the appellate briefs and undertook oral argument preparation for the January 14, 2025, supreme court oral argument, which was postponed after Plaintiffs provided notice of settlement on December 18, 2024.

5. The total numbers of hours recorded by my firm on this litigation is 175.1 hours. The lodestar for my firm for that same period is \$74,125.00. 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 and 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:

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David Seligman, Esq.	Executive Director	37.4	\$600	\$22,400.00
Juno Turner, Esq.	Litigation Director	1.1	\$600	\$660.00
Brianne Power, Esq.	Attorney	135.8	\$375	\$50,925.00
Deborah Schaffer	Investigator & Analyst	.8	\$125	\$100.00
	TOTALS:	175.1		\$74,125.00

7. My firm has incurred a total of \$111.00 in unreimbursed reasonable and necessary litigation expenses through October 1, 2025, as detailed here:

<u>Description</u>	<u>Amount</u>
Colorado E-Filing Fees	\$111.00

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 1, 2025

/s/Brianne Power
 Brianne Power