

EXHIBIT 3

September 28, 2019

Honorable Andrew J. Guilford
United States Courthouse
Santa Ana Division
411 West 4th Street, Room 1053
Santa Ana, CA 02701-4750

Wells Fargo CPI Settlement
Settlement Administrator
PO Box 4990
Portland, OR 97208-4990

Re: Loan Number ending in [REDACTED]
Loan Date: 10/31/2007
Borrowers: Michael Varallo
and Ruth Varallo
Vehicle: Kia Sorento
VIN ending in [REDACTED]
Tracking Numbers: [REDACTED]
and [REDACTED]

**Objection to the settlement in *In Re Collateral Protection Insurance Litigation*.
Case No, 8:17-ML-2797-AG-KES**

Your Honor and the Settlement Administrator:

We have been identified as a settlement class member in the Notice of Proposed Settlement of Class Action. Recently, we requested in writing a no-cost mediation of our claim. A copy is enclosed.

We hereby object to the settlement in this action on two grounds: first, regarding the calculation of damages, on behalf of ourselves and the specific subset of class members who did not reside in the states of Arkansas, Michigan, Mississippi, Tennessee or Washington when CPI was placed on their account and, secondly, on behalf of the entire class regarding attorney fees.

Our objection regarding the calculation of damages is as follows. Our Kia Sorento was repossessed on June 10, 2012 and we believe we are entitled to additional reimbursement as detailed on page 6 of the Notice. In January of 2019 we received and cashed a check for \$47.53 from Wells Fargo. Frankly, we had no idea why they sent us this check. We did not receive the Notice until this month so we were not provided with any explanation until then.

We have been informed by counsel that we would receive additional compensation automatically (as set forth on page 6 of the Notice, including the payment of \$4,000.00) if we resided in one the five states listed above when CPI

was placed on our account. We moved to Washington from Colorado (where our loan occurred) in April, 2018 to be near our oldest son and his family, so we allegedly do not qualify for the additional compensation.

We assert that this discrimination based on residence is a blatant violation of equal protection of the law and due process. We have never received an explanation for why this discrimination is part of the settlement and cannot fathom any rational basis for the gross inequity. This disparity is unfair, unreasonable and inadequate. Surely, our repossession was just as damaging to us and others like us as for residents of the five unfairly preferred States.

Secondly, we object to the amount of attorney fees as excessive and unearned. Page 9 of the Notice sets forth that the attorneys will be paid up to "\$36 million for fees and \$500,000 for costs." Our objection is based on the fact that the attorneys did not protect our interests and those claimants in the non-preferred States. Perhaps, it was easier and faster to get a lucrative settlement for the attorneys if they reduced the damages for so many claimants? We do not know but it appears suspicious. The attorneys make millions why we the victims get peanuts. This is a principal reason why class actions are viewed suspiciously by so many in the public. Only the attorneys seem to win big.

We are sending a copy of this Objection to all lawyers listed on page 8 of the Notice. Thank you for your time and consideration.

Michael Varallo

Michael Varallo

Ruth Anne Varallo

Ruth Varallo

Address of both Objectors:

[REDACTED]

[REDACTED]

cc Baron and Budd, P.C.
Robins Kaplan, LLP
Casey Gerry Schenk
Gibbs Law Group LLP
Levin Sedran & Berman
Weitz & Luxenberg, P.C.

September 10, 2019

Wells Fargo CPI Settlement
Settlement Administrator
PO Box 4990
Portland, OR 97208-4990

Re: Loan Number ending in [REDACTED]
Loan Date: 10/31/2007
Borrowers: Michael Varallo
and Ruth Varallo
Vehicle: Kia Sorento
VIN ending in [REDACTED]
Tracking Number: [REDACTED]

Dear Sir or Madame:

We hereby request a no-cost mediation in our claim as set forth on page 7 of the "Notice of Proposed Settlement of Class Action".

Our Kia Sorento was repossessed on June 10, 2012 and we believe we are entitled to additional reimbursement as detailed on page 6 of the Notice. We also request a copy of our entire file in order to prepare for the mediation.

We are sending a copy of this request to all lawyers listed on page 8 of the Notice since we do not expect that Wells Fargo will act in good faith on this request for mediation. Based on our experience during the repossession of our vehicle, and our recent telephone conversations on this request, we expect that we will receive the infamous Wells Fargo runaround. For example, last week we called Wells Fargo multiple times at 877.641.8815 and 877.241.6571. We spent over an hour on the telephone, most of which was on hold. We spoke to seven people, none of whom could help us. In fact two of the employees tried to talk us out of mediation by saying that we were not eligible for mediation, even though they did not know the facts and had not even read the Notice. It appears to us that Wells Fargo has not changed its business methods and still seeks to take advantage of its customers.

Please respond as soon as possible.

Michael Varallo
Michael Varallo

Ruth A. Varallo
Ruth Varallo

COPY

[REDACTED]
[REDACTED]

Varallo

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