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9 ** Additional counsel listed on signature page*

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **SOUTHERN DIVISION**

13 IN RE WELLS FARGO COLLATERAL
14 PROTECTION INSURANCE
15 LITIGATION

Case Number: 8:17-ML-2797-AG-KES

**SUPPLEMENTAL DECLARATION
OF ROLAND TELLIS, ROMAN M.
SILBERFELD, AND DAVID S.
CASEY, JR. IN SUPPORT OF
PLAINTIFFS' REPLY (1) IN
SUPPORT OF MOTIONS FOR
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND FOR
AN AWARD OF ATTORNEYS'
FEES, REIMBURSEMENT OF
EXPENSES, AND SERVICE
AWARDS; AND (2) IN RESPONSE
TO BRIEF OF AMICUS CURIAE**

Date: October 28, 2019
Time: 10:00 am
Courtroom: 10D

Hon. Andrew J. Guilford

1 We, Roland Tellis, Roman M. Silberfeld, and David S. Casey, Jr., declare as
2 follows:

3 1. We are all attorneys who are licensed to practice before this Court and all
4 courts of the State of California. Roland Tellis and Roman M. Silberfeld are partners in
5 the law firms of Baron & Budd, P.C. and Robins Kaplan LLP, respectively, and were
6 appointed by this Court as Co-Lead Counsel for Plaintiffs and the putative class in the
7 above-captioned matter. David S. Casey, Jr. is a partner in the law firm of Casey, Gerry,
8 Schenk, Francavilla, Blatt & Penfield, LLP, and was appointed by this Court as Liaison
9 Counsel for Plaintiffs and the putative class. We have personal knowledge of the
10 following facts, and if called as witnesses, we could and would testify competently to
11 them. We make this declaration in support of Plaintiffs' Reply (1) in Support of Motion
12 for Final Approval of Class Action Settlement and Plaintiffs' Motion for an Award of
13 Attorneys' Fees, Reimbursement of Expenses, and Service Awards; and (2) in Response
14 to Brief of Amicus Curiae.

15 2. The deadline to object to, or opt-out of, the Settlement was October 7, 2019.
16 As of Monday, October 21, 2019, five Settlement Class Members have objected to the
17 Settlement and 78 have opted out.

18 3. As of Monday, October 21, 2019, 2,254,411 initial Notice Packets and
19 139,293 re-mailed Notice Packets, for a total of 2,393,704 Notice Packets have been sent
20 to Settlement Class Members through the United States Postal Service as First Class Mail.

21 4. As of Monday, October 21, 2019, 1,019,408 Summary E-Mail Notices have
22 been sent to Settlement Class Members with valid e-mail addresses.

23 5. As of Monday, October 21, 2019, the Settlement website
24 (<http://www.wellsfargocpisettlement.com/en>) has had 344,077 visits, representing
25 250,589 unique users and over 475,077 website pages presented.

26 6. Attached as **Exhibit 1** to this Declaration is a true and correct copy of the e-
27 mail sent by Settlement Class Member Jason Morrison to Class Counsel.
28

1 7. Attached as **Exhibit 2** to this Declaration is a true and correct copy of the
2 Thank You card sent by Settlement Class Member Chrishanda Dejanette to Class
3 Counsel.

4 8. Attached as **Exhibit 3** to this Declaration is a true and correct copy of the
5 objection from Michael Varallo and Ruth Varallo.

6 9. Plaintiffs' counsel has learned from Wells Fargo that the Michael Varallo
7 and Ruth Varallo did not experience a repossession due to Collateral Protection Insurance
8 ("CPI"). Mr. & Mrs. Varallo took out two different loans on the vehicle at issue. The first
9 loan, which originated on October 31, 2007, had a CPI policy placed on it that was
10 subsequently cancelled. The \$47.53 refund mentioned in their objection relates to that CPI
11 policy. On September 22, 2010, Mr. & Mrs. Varallo's loan was paid off. That same day,
12 Mr. & Mrs. Varallo took out a second loan on the same vehicle. Unlike the first loan, the
13 second loan never had a CPI policy placed on it. On June 10, 2012, Mr. & Mrs. Varallo's
14 vehicle was repossessed for reasons other than CPI. Because CPI was not the cause of
15 their repossession, Mr. & Mrs. Varallo are not entitled to repossession compensation.

16 10. Attached as **Exhibit 4** to this Declaration is a true and correct copy of the
17 objection from Dawn Horton.

18 11. Attached as **Exhibit 5** to this Declaration is a true and correct copy of the
19 objection from Delthenia Bell.

20 12. Attached as **Exhibit 6** to this Declaration is a true and correct copy of the
21 objection from Brenda B. Starnes.

22 13. Attached as **Exhibit 7** to this Declaration is a true and correct copy of the
23 objection from Dianne Neal.

24 14. Attached as **Exhibit 8** to this Declaration is a true and correct copy of the
25 opt-out letter sent by the Law Office of Macy D. Hanson on behalf of Dianne Neal.

26 15. Attached as **Exhibit 9** to this Declaration is a true and correct copy of the
27 opt-out letter sent by the Law Office of Macy D. Hanson on behalf of Robert Neal.
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1 16. Attached as **Exhibit 10** to this Declaration is a list showing the names of the
2 78 Settlement Class Members who have opted out of the Settlement.

3 We declare under penalty of perjury, under the laws of the State of California and
4 the United States, that the foregoing is true and correct to the best of our knowledge.

5 Dated: October 21, 2019

Respectfully submitted,

6 By: /s/ Roland Tellis

7 Roland Tellis

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9 By: /s/ Roman M. Silberfeld

10 Roman M. Silberfeld

11
12 By: /s/ David S. Casey, Jr.

13 David S. Casey, Jr.

CERTIFICATE OF SERVICE

1
2 I hereby certify that on October 21, 2019, I electronically filed the foregoing
3 document entitled **SUPPLEMENTAL DECLARATION OF ROLAND TELLIS,**
4 **ROMAN M. SILBERFELD, AND DAVID S. CASEY, JR. IN SUPPORT OF**
5 **PLAINTIFFS’ REPLY (1) IN SUPPORT OF MOTIONS FOR FINAL APPROVAL**
6 **OF CLASS ACTION SETTLEMENT AND FOR AN AWARD OF ATTORNEYS’**
7 **FEES, REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS; AND (2) IN**
8 **RESPONSE TO BRIEF OF AMICUS CURIAE** with the Clerk of the Court for the
9 United States District Court, Central District of California using the CM/ECF system and
10 served a copy of same upon all counsel of record via the Court’s electronic filing system.
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12 */s/ Roland Tellis*

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14 Roland Tellis
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