

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

TOMEKA BARROW and ANTHONY \*  
DIAZ, Individually and On Behalf of All \*  
Others Similarly Situated, \*  
 \*  
Plaintiffs, \*  
 \*  
v. \*  
 \*  
JPMORGAN CHASE BANK, N.A., \*  
 \*  
Defendant. \*  
 \*

Civil Action File No.

1:16-cv-03577-AT

**DECLARATION OF ANTHONY DIAZ IN SUPPORT OF  
MOTION FOR ATTORNEYS’ FEES, COSTS AND SERVICE AWARDS**

**I, ANTHONY DIAZ, declare:**

1. I am one of the named Plaintiffs in this above-captioned action against JPMorgan Chase Bank, N.A. (“Defendant” or “JPMC”).
2. If called as a witness, I would competently testify to the matters herein from personal knowledge.
3. I am filing this Declaration in support of Plaintiffs’ Motion for Attorneys’ Fees, Costs and Service Awards (the “Fee Brief”).
4. On March 16, 2018, I was appointed one of the two class representatives for purposes of the settlement with JPMC. I believe that I have looked after the best interests of the settlement class members.

5. I am informed that thousands of claims to the settlement have been received thus far and there are currently no objections to the settlement.
6. I joined this lawsuit as a plaintiff against JPMC on March 21, 2017, and I have participated throughout the litigation against JPMC (including the prior action that I filed in *Diaz v. J.P. Morgan Chase Bank, N.A.*) in the belief I was helping all other persons similarly situated. I met with my attorneys for the initial consultation, participated in calls regarding fact-finding efforts with my attorneys, served written discovery requests on Defendant and also responded to written discovery requests from Defendant, submitted a declaration in support of preliminary approval, and now submit this declaration.
7. I understand that my attorneys have requested that each Class Representative be awarded an incentive payment of up to \$5,000 to be paid from the Settlement Fund. I further understand that any such award has to be approved by the Court, and I request such service award for my efforts in prosecuting this action and representing the settlement class.
8. I support the attorneys Kazerouni Law Group, APC and Hyde & Swigart's request for attorneys' fees of \$675,000, representing 30% of the settlement fund, as well as up to \$40,000 in litigation expenses.

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

Executed on July 3<sup>rd</sup>, 2018, pursuant to the laws of California and the United States  
of America.

A handwritten signature in black ink, appearing to read "Diaz", written over a horizontal line.

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Anthony Diaz