

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

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**DECLARATION OF TOMEKA BARROW IN SUPPORT OF  
MOTION FOR ATTORNEYS' FEES, COSTS AND SERVICE AWARDS**

**I, TOMEKA BARROW, 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. In my efforts to represent the class members, I participated in an initial consultation with my attorneys, held phone calls regarding fact-finding efforts with my attorneys, served written discovery requests on Defendant, submitted a declaration in support of preliminary approval of the settlement, and now submit this declaration in support of the Fee Brief.
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 bringing this action and representing the settlement class.
8. I support Plaintiffs' counsel'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 9, 2018, pursuant to the laws of Georgia and the United States  
of America.

A handwritten signature in cursive script, appearing to read "Tomeka Barrow", is written above a solid horizontal line.

Tomeka Barrow