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11 Attorneys for Plaintiffs TAQUELIA WASHINGTON TOLAND AND GEORGIA TOLAND
12 Individually and on Behalf of All Others Similarly Situated

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15 UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 TAQUELIA WASHINGTON TOLAND
18 and GEORGIA TOLAND, individually
19 and on behalf of All Others Similarly
20 Situated,

20 Plaintiffs,

21 vs.

22 NATIONSTAR MORTGAGE LLC, a
23 Delaware limited liability company;
24 VERIPRO SOLUTIONS INC., a Delaware
25 corporation, and DOES 1 through 20,

25 Defendants.

Case No. 3:17-cv-02575-JD

CLASS ACTION

**DECLARATION OF ARTHUR D.
LEVY IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF
PROPOSED CLASS ACTION
SETTLEMENT**

**Date: April 21, 2022
Time: 10:00 a.m.
Courtroom 11, 19th Floor
Hon. James Donato**

Complaint Filed: March 24, 2017

26 I, ARTHUR D. LEVY, do hereby declare as follows:

27 I. I am an attorney at law, duly licensed to practice in the State of California. I have served
28 as one of the attorneys for Plaintiffs Taquelia Washington Toland and Georgia Toland in this

1 litigation. I have personal knowledge of all information stated below, or the information is based
2 upon my review of the file in this matter, and I am competent to testify thereto.

3 2. I submit this declaration in support of Plaintiffs' Motion for Final Approval. I previously
4 submitted my professional history in my declaration in support of Plaintiffs' Motion for
5 Preliminary Approval [Dkt. No. 117-2], which is incorporated by reference herein.

6 3. Since the mailing of Class notice on December 10, 2021, my office has received inquiries
7 from 41 Class members about the Settlement, either on the toll-free phone line listed for counsel
8 on the Class notice or via the email address similarly provided.

9 4. I personally responded to each of these inquiries and did so promptly. I encouraged all
10 Class members to file timely claims if they did not appear on the Collection Letter Subclass List
11 and if they could legitimately do so.

12 5. Several Class members were unable to submit claims because they had sold their homes
13 in non-short sales, and had not been foreclosed. Others could not remember the loan transaction
14 or say whether the loan had been purchase money. I informed those Class members that they
15 should not submit claims because they could not truthfully attest to Class membership on the
16 claim form.

17 6. Other Class members informed me that the Nationstar tradeline for the mortgage no
18 longer appeared on their credit reports. I informed them that it was optional for them to submit a
19 claim, but if the tradeline no longer appeared on their TransUnion, Experian, or Equifax credit
20 reports, there would be no credit reporting benefit to them from the Settlement.

21 7. Still other people informed me that the borrower was deceased. After confirming that the
22 deceased borrower did not appear on the Collection Letter Subclass List, I informed them that
23 there did not seem to be a benefit from submitting a claim because there would be no benefit to a
24 deceased person from an improvement in their credit report.

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I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct, and that this Declaration is executed on March 15, 2022 at Oakland, California.


ARTHUR D. LEVY