

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

WENDELL H. STONE COMPANY, INC.
d/b/a STONE & COMPANY, individually
and on behalf of all others similarly situated,

Plaintiff,

v.

LKQ CORPORATION, a Delaware
corporation

Defendant

Case No. 1:16-cv-07648

Hon. Matthew F. Kennelly

**DECLARATION OF ATTORNEY STEVEN L. WOODROW IN SUPPORT
OF MOTION FOR AN AWARD OF REASONABLE ATTORNEYS' FEES
AND FOR REIMBURSEMENT OF COSTS AND FOR THE CLASS
REPRESENTATIVE'S INCENTIVE AWARD**

I, Steven L. Woodrow, declare as follows:

1. I am over the age of eighteen (18), and am one of the attorneys for Plaintiff and the Class in this matter. I make this declaration in support of Plaintiff's Motion for an Award of Reasonable Attorneys' Fees and for Reimbursement of Costs and for the Class Representative's Incentive Award in the above captioned litigation. I am able to testify to the matters set forth herein if called upon to do so. I make the following statements based upon my own personal knowledge and based on facts learned during the litigation of this case.

Class Counsel's Pre-Suit Investigation and Early Litigation

2. Prior to filing the instant lawsuit my firm in conjunction with our co-counsel conducted an investigation into LKQ/Coast Distribution's facsimiles, specifically the sufficiency of the faxes' opt-out language and LKQ's liability for faxes sent by Coast Distribution.

3. Through this investigation, we communicated regularly with our client regarding the particulars of its experience with LKQ, including testing Stone's receipt of the faxes,

relationship with LKQ, LKQ's responsibility for faxes sent by Coast Distribution, and the legal landscape surrounding the sending of faxes with insufficient opt out language under the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq.; 47 C.F.R. 64.1200 et seq., particularly fax opt out language cases in the wake of the Supreme Court's decision in *Spokeo, Inc. v. Robins*, 136 S. Ct. 1540, 1543, 194 L. Ed. 2d 635 (2016), *as revised* (May 24, 2016), and the FCC's July 2015 Order (*see In re Rules and Regulations Implementing the TCPA of 1991*, Declaratory Ruling and Order, CG Docket No. 02–278, WC Docket No. 07–135, FCC 15–72, ¶¶ 49, 52, 2015 WL 4387780 (released Jul. 10, 2015), <https://www.fcc.gov/document/tcpa-omnibus-declaratory-ruling-and-order>) (last visited March 27, 2017)).

4. Once our investigation was complete we outlined a case strategy, and we reviewed and edited the initial draft of the pleadings in the case, which included the Class Action Complaint. We thereafter filed the Complaint on July 28, 2016 (dkt. 1) and obtained service.

The Parties Commence Early Settlement Discussions and Proceed to Mediation

5. On August 28, 2016, the Court set an initial status conference for September 26, 2016. (Dkt. 3.) In early September, defense counsel from the prestigious Chicago law firm of Shook, Hardy & Bacon reached out via email to indicate that they were representing LKQ. LKQ requested additional time to answer or otherwise plead, and the Parties worked out the language of an agreed upon extension.

6. During these early talks counsel for the Parties also exchanged their 30,000ft overviews of the claims and defenses and broached the subject of settlement. During subsequent communications between counsel, potential settlement models were reviewed and discussions began to turn to the possibility of engaging in a private mediation process and the information that Plaintiff's counsel needed prior to being able to negotiate effectively.

7. During this period, and so as to protect the class claims against any "buy off" attempts under Rule 67, on September 23, 2016 Class Counsel filed a "placeholder" motion for class certification. (Dkt. 12.) While just a few months back this was perhaps considered unnecessary, the law in this District was called somewhat into question by Judge Chang's decision in *Fulton Dental, LLC v. Bisco, Inc.*, No. 15 C 11038, 2016 WL 4593825 (N.D. Ill. Sept. 2, 2016).

8. Meaningful progress was made in the run up to the Court's initial status conference with respect to setting up a mediation, and during the Rule 16(b) conference held October 21, 2016 the Parties advised the Court that they were preparing to mediate the case and requested a brief period of time to do so. (Dkt. 15.) The Court set a status for late November to ensure a mediation had been scheduled. During the telephonic status of November 22, 2016 the Parties advised that they were proceeding to mediation with the Honorable Morton J. Denlow (Ret.) of JAMS in Chicago, Illinois on December 19, 2016 (Dkt. 18.)

Mediation With Magistrate Judge Denlow (Ret.)

9. The Parties performed substantial work in the lead up to the mediation with Magistrate Judge Denlow. In addition to providing significant briefing, Magistrate Judge Denlow utilizes a "class action checklist" that requires additional consideration. Additionally, the Parties exchanged information on a more informal basis through sets of emailed questions. Through this exchange and other discussions of counsel Class Counsel were able to determine the six and scope of the class, the potential exposure, and potential mitigating factors (*e.g.*, the fact that the case alleges a technical violation, *Spokeo*, the Parties' potential prior business dealings (and LKQ/Coast's business relationships with other class members), and other issues, such as the D.C. Circuit's review of the 2015 FCC Order, and LKQ's ability to seek a retroactive waiver.

10. Class Counsel flew to Chicago for the mediation. During the process, counsel for the Parties were able to engage in an open and frank discussion about the merits of how each viewed the merits of the claims and defenses, and Magistrate Judge Denlow's process helped the Parties focus on a framework that would maximize the Settlement Class's overall recovery.

11. Ultimately, and with Judge Denlow's substantial assistance, the Parties were able to reach an agreement in principle with respect to the Settlement's key terms. Only after an agreement was reached with respect to the relief to be made available to the Settlement Class did the Parties discuss reasonable attorneys' fees and incentive awards. While LKQ has agreed not to object to an amount seeking up to one-third of the proposed Settlement Fund, the Parties *always* understood that the amount of any fees would ultimately be subject to the Court's approval.

12. The Parties left the mediation with a signed term sheet and worked together in the weeks following the mediation to efficiently draft formal settlement documents and have them executed.

The Parties Work to Obtain Preliminary Approval & Notice Is Issued to the Class

13. The Parties exchanged drafts of the Settlement Agreement and notice documents. Once the finer details of the Settlement Agreement and the notices were finalized and the agreement was executed, Class Counsel drafted the papers in support of Preliminary Approval and traveled to Chicago for the Preliminary Approval Hearing held January 25 2017. (*Id.* ¶ 26.)

14. During the hearing the Court indicated that the Settlement would receive preliminary approval. (Dkt. 26.) Thereafter, we worked with both LKQ's counsel and the Settlement Administrator to finalize the Settlement Website and the Class Notices and to mail them out to Settlement Class Members.

Response to the Settlement to Date

15. Since notice was disseminated, Class Counsel's law firm has received several calls from Settlement Class Members seeking additional information about the nature of the claims and the relief made available under the settlement agreement. Many of the callers are surprised to learn that federal law includes such a claim.

16. To date, only 6 Settlement Class Members have elected to opt-out and none have objected, signaling overwhelming satisfaction with the results. If the Court ultimately awards amounts from the Settlement as contemplated by the Agreement, then the Settlement Class Members will receive checks for approximately \$330—a per claim amount that nearly doubles the amount typically awarded in TCPA class action settlements (according to our research).

Class Counsel's Hours and Rates

17. As of the filing of the Motion for an Award of Reasonable Attorneys' Fees and For Reimbursement of Costs and for the Class Representative's Incentive Award ("Motion for Attorneys' Fees") the lawyers of our firm have expended the following hours¹ pursuing the claims and crafting the settlement of this case:

Attorney	Title	Rate	Hours	Total
Steven Woodrow	Partner	\$440	205.9	\$90,596.00
Patrick Peluso	Partner	\$340	159.6	\$54,264.00
Stefan Coleman	Partner	\$450	140.2	\$63,090.00

18. The time spent to date is reasonable. Meaningful work was performed before the

¹ Class Counsel's time sheets are available upon request for the Court's review. Further, and in addition to posting the Motion for Attorneys' Fees to the Settlement Website, the website will include a statement indicating that any Settlement Class Member can request a copy of Class Counsel's time sheets for review.

case was ever filed to ensure that the claims were as well-positioned as possible. Likewise, the settlement wasn't the result of historical accident or luck. While the opt out language runs afoul of the plain language of the TCPA, the closest authority on-point was potentially distinguishable in this instance given that the faxes contained at least *some* notification letting recipients know they could opt out. As such, significant time was spent performing legal research to ensure that the Settlement Class put forward the legal theory with the best chances of success. Additionally, during the case Class Counsel had to research further information regarding LKQ's liability for Coast's pre-merger conduct and to account for the D.C. Circuit appeal of the 2015 FCC Order. This is of course in addition to numerous communications with opposing counsel in the lead up to the mediation, the conducting of the mediation, and the negotiation and finalization of the settlement documents filed in the case. Class Counsel has also been responsive to the needs of Settlement Class Members and have returned all inquiries promptly. Class Counsel estimates that an additional \$10,000 in attorney time will be needed to finalize the Settlement, which includes reviewing and completing the confirmatory discovery process. And, of course, Class Counsel took on this case on a contingent fee basis.

19. Furthermore, Class Counsel's hourly rates are reasonable. Class Counsel's rates are comparable to those charged to private clients and have been approved by various courts. (*See Couch v. Southwest Airlines Co.*, 3:15-cv-00367-N (N.D. Tex. 2016) (*Couch* Dkt. 43) (approving Woodrow & Peluso's 2016 rates of \$430 (for Woodrow) and \$330 (for Peluso)); *see also Wigod v. Wells Fargo Bank, N.A.*, Case No: 1:10-cv-2348 (N.D. Ill. 2014) (Bucklo, J.) (Wigod Dkt. 278)) (approving hourly rate of \$570 for attorney Woodrow in 2014); *see also Schulken v. Washington Mutual Bank*, No. 09-CV-02708-LHK (N.D. Cal.) (*Schulken* Dkt. 223) (Koh J.) (approving attorney Woodrow's former hourly rate of \$500 in 2012)). Mr. Woodrow's

hourly rate is presently lower than his prior rate when he was employed at a larger class action law firm out of recognition that smaller firms generally command lower hourly rates. The market is the market. That said, I don't believe my skillset has experienced a commensurate drop off.

Class Counsel's Out of Pocket Expenses

20. In addition to expending time on the case, Class Counsel incurred certain out-of-pocket expenses. These charges include our filing fees, service of process, the mediation, travel to Chicago for the mediation and for the preliminary (and final) approval hearing, and related expenses. Class Counsel's expenses in this matter total \$10,867.24.

21. Having review the expenses, I attest that they are necessary and reasonable and were incurred as a result of the demands imposed by the litigation. None of the expenses are for lavish accommodations or for unnecessary items. Further, we expended monies for these items without any guarantee of payment. As such, the Court should approve the requested expenses of \$10,867.24.

Proposed Class Counsel's Opinion of the Settlement Agreement

22. Proposed Class Counsel is excited to present the terms of the Settlement Agreement to the Court. The terms are unquestionably strong when viewed against other TCPA fax opt out language settlements reached to date. The per-claim monetary amounts fall at the higher end of such settlements, and the Settlement Agreement requires LKQ to fix its allegedly problematic fax language. More importantly, there is no claims process. This means that nearly everyone in the Class will automatically receive checks for relatively meaningful amounts (given the technical nature of the violation). There can be little argument that the Settlement Agreement isn't a strong and impressive result for the Settlement Class Members.

23. As evidenced by the attached Firm Resume, proposed Class Counsel have

extensive experience in prosecuting similar TCPA class actions and other complex litigation, including fax cases. (See Woodrow & Peluso, LLC Firm Resume, attached hereto as Ex. 1.)

24. As indicated above, my firm has diligently investigated and prosecuted *this* matter by dedicating substantial resources to the investigation of the claims at issue in the Action and have successfully negotiated this Settlement with LKQ.

25. Our Motion for Approval of Attorneys' Fees is readily supported as both a percentage of the relief made available to the Class and when calculated as a reasonable multiplier of Class Counsel's lodestar.

Further affiant sayeth not.

Signed this 28th day of March, 2017 in Denver, Colorado.

/s/ Steven L. Woodrow
Steven L. Woodrow

EXHIBIT 1

WOODROW & PELUSO, LLC FIRM RESUME

WOODROW & PELUSO, LLC (“Woodrow & Peluso” or the “firm”) is a plaintiff’s class action and commercial litigation firm based in Denver, Colorado. The firm files cases across the Country.

Our attorneys have over a decade of experience successfully representing consumers and small businesses in matters nationwide. From litigation under the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.*, to cases enforcing the rights of job applicants and employees under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.*, to appeals of first impression, our lawyers have litigated and favorably resolved numerous legal disputes to the satisfaction of our clients. At Woodrow & Peluso, LLC, we take special pride in the quality of our work product and strive tirelessly to achieve the best results for every client. Descriptions of our three primary practice areas—(1) Consumer Class Actions, (2) Commercial Litigation, and (3) Appeals—and key personnel follow.

OUR PRACTICE AREAS

1. CONSUMER CLASS ACTIONS

The majority of the firm’s caseload focuses on consumer class actions. These cases include class actions alleging violations of statutes, such as the Fair Credit Reporting Act, the Telephone Consumer Protection Act, and the Truth-in-Lending Act, as well as class actions challenging systematic breaches of contract and advancing other common law theories.

TCPA Class Actions

Woodrow & Peluso attorneys have successfully litigated and settled numerous class actions challenging violations of the Telephone Consumer Protection Act. To date we have filed, prosecuted, and resolved using various settlement models TCPA cases against major corporations and entities including Rita's Italian Ice, Global Marketing Research Services, LKQ Corporation, J.B. Hunt, Altisource, Acurian, Price Self Storage, Local Lighthouse, Geekatoo, and the University of South Carolina, among others. Our firm’s attorneys have substantial experience prosecuting such claims, including class actions challenging the unlawful transmission of text messages, the sending of unlawful facsimiles, the placement of “robocalls” featuring a pre-recorded voice to residential landline phones, and the use of automatic telephone dialing systems, including predictive dialers, to call consumer cell phones.

Notable TCPA cases and settlements include:

- *Martin et al. v. Global Marketing Research Services, Inc.*, 6:14-cv-1290-ORL-31-KRS (M.D. FL) (Woodrow & Peluso appointed co-lead Settlement Class Counsel in settlement creating \$10 million fund for class of 688,500 cellphone users) (final approval granted November 4, 2016);
- *Mendez v. Price Self Storage Management, Inc.*, 3:15-cv-02077-AJB-JLB (S.D. CA) (Woodrow & Peluso appointed co-lead Settlement Class Counsel in TCPA settlement

providing option of \$750 cash or \$1,100 in storage certificates) (final approval granted August 23, 2016);

- *Sherry Brown and Ericka Newby v. Rita's Water Ice Franchise Company, LLC*, 2:15-cv-03509-TJS (E.D. PA) ("all in" non-reversionary \$3,000,000 settlement fund for text messages) (preliminary approval granted March 24, 2016);
- *Wendell H. Stone & Co. v. LKQ Corporation*, 16-cv-07648 (N.D. Ill) (all in" non-reversionary" settlement fund of \$3,266,500) (preliminary approval granted January 25, 2017).

Further, while a Partner with his prior law firm, Woodrow & Peluso attorney Steven Woodrow was appointed interim co-lead class counsel in a TCPA class action against Nationstar Mortgage, LLC (*see Jordan et al v. Nationstar Mortgage LLC*, 3:14-cv-00787-WHO) and led TCPA litigation that resolved favorably against Bankrate Inc., and Carfax.com. Mr. Woodrow was also involved in the TCPA settlement reached in *Weinstein v. The Timberland Co. et al.* (N.D. Ill.), a text messaging class action featuring 40,000 unauthorized messages, and was part of the appellate strategy team that secured the landmark decision in *Satterfield v. Simon & Schuster, Inc.*, 569 F.3d 946 (9th Cir. 2009), the first federal appellate decision to affirm that text messages are covered as "calls" under the TCPA.

FCRA Class Actions

The second sub-focus within the firm's class action practice consists of cases under the Fair Credit Reporting Act ("FCRA"), which regulates the procurement and use of consumer reports by employers when they make hiring/firing/pay decisions. To date, the firm has successfully represented clients in putative class actions against Terminix, ServiceMaster, TrueBlue Inc./Labor-Ready Mid-Atlantic, FedEx, Tyler Staffing Services, Inc., Great Lakes Wine & Spirits, Freeman Webb, Inc., and others. This includes *Woodford v. World Emblem* 1:15-cv-02983-ELR, an FCRA settlement providing between \$315 and \$400 to claimants (final approval granted January 23, 2017).

Banking and Financial Institutions Class Actions

Our attorneys have substantial experience representing consumers in class action litigation involving national banking associations and other financial institutions. Meaningful representations include:

- *Schulken v. Washington Mut. Bank*, No. 09-CV-02708-LHK, 2012 WL 28099, at *15 (N.D. Cal. Jan. 5, 2012). Attorney Steven Woodrow secured prior firm's appointment as Class Counsel from Judge Lucy Koh in class action challenging JPMorgan Chase Bank, N.A.'s suspension of former WaMu home equity line of credit accounts. Case settled with Mr. Woodrow's appointment as co-lead settlement class counsel.
- *In re JPMorgan Chase Bank, N.A. Home Equity Line of Credit Litigation*, MDL No. 2167. Attorney Steven Woodrow helped secure transfer by the

Judicial Panel on Multidistrict Litigation to the Northern District of Illinois and appointment of prior firm as interim class counsel. Attorney Woodrow also negotiated and was also appointed co-lead settlement class counsel in settlement projected to restore between \$3 billion - \$5 billion in credit to affected borrowers in addition to cash payments.

- *Hamilton v. Wells Fargo Bank, N.A.*, 4:09-cv-04152-CW (N.D. Cal.). Attorney Steven Woodrow served as co-lead settlement counsel in class action challenging Wells Fargo's suspensions of home equity lines of credit. Nationwide settlement restored access to over \$1 billion in credit and provided industry leading service enhancements and injunctive relief.
- *In re Citibank HELOC Reduction Litigation*, 09-CV-0350-MMC (N.D. Cal.). Attorney Steven Woodrow was appointed interim co-lead counsel and settlement class counsel in class actions challenging Citibank's suspensions of home equity lines of credit. The settlement was estimated to have restored over \$650,000,000 worth of credit to affected borrowers.
- *Vess v. Bank of America, N.A.* 10cv920-AJB(WVG) (S.D. Cal.). Attorney Steven Woodrow negotiated class action settlement with Bank of America challenging suspension and reduction of home equity lines of credit.
- *Wigod v. Wells Fargo*, No. 10-cv-2348 (N.D. Ill.). Steven Woodrow secured the first appellate decision in the country recognizing the right of homeowners to sue under state law to enforce HAMP trial plan agreements. Attorney Steven Woodrow was appointed co-lead settlement counsel providing loan modifications and cash payments to affected borrowers.

General Consumer Protection Class Actions

Woodrow & Peluso attorneys have additionally successfully prosecuted and resolved countless class action suits against other companies for a range of consumer protection issues. For example, Woodrow & Peluso filed the first class action in the Country to challenge the marijuana industry's use of certain allegedly dangerous fungicides and pesticides and were the first lawyers to bring class actions (against the Colorado Rockies Baseball Club and Kroenke Sports & Entertainment, LLC) seeking to enforce the Colorado Consumer Protection Act, § 6-1-718 *et seq.*, which prohibits owners of entertainment venues from imposing restrictions on the resale of tickets. The firm has also brought and litigated class actions against hospitals for their use of "chargemaster" billing rates and are presently engaged in litigation against Southwest Airlines related to its "Companion Pass" program.

Woodrow & Peluso LLC has also brought claims against major food manufacturers and distributors for falsely advertising certain products as "All Natural" and "Made in U.S.A." Our attorneys also have experience litigating class claims regarding missing or misappropriated "bitcoins." Woodrow & Peluso also brought the first class action in Colorado against cannabis growers for their use of unapproved and harmful pesticides.

2. COMMERCIAL LITIGATION

As small business owners, we understand and appreciate the challenges that new companies face as they strive to make headway in the market. Our attorneys regularly counsel small businesses and have represented such companies in a wide range of general commercial litigation matters including partnership and business disputes, breaches of contracts and term sheets, and claims charging company managers and members of breach of fiduciary duty, breach of contract, fraud, and fraudulent/preferential transfer. We regularly advise clients on matters and contracts involving millions of dollars, and our attorneys have successfully represented businesses and other entities in mediations, arbitrations, and trial.

3. APPEALS

Our attorneys have substantial experience handling appeals at both the state and federal level. Representative appeals worked on predominately by our attorneys include:

- *Wigod v. Wells Fargo Bank, N.A.*, 673 F.3d 547 (7th Cir. 2012). Attorney Steven Woodrow briefed and argued this appeal resulting in the first federal appellate decision holding that banks may be sued under state law for violations of the federal government's Home Affordable Modification Program. The opinion has been cited over 1,300 times by courts, litigants, and commentators throughout the Country and is widely regarded as the leading authority on the rights and obligations of HAMP servicers and borrowers.
- *Robins v. Spokeo*, 742 F.3d 409 (9th Cir. 2014). Attorney Steven Woodrow argued a federal appeal reversing dismissal and upholding consumer rights under the Fair Credit Reporting Act against one of the nation's largest online data aggregators regarding whether a plaintiff who does not suffer tangible pecuniary loss may still show legal harm to satisfy Article III standing. The case is currently pending before the United States Supreme Court and has been frequently reported on as one of three major class action issues presently on the Supreme Court's docket.
- *Equity Residential Properties Mgmt. Corp. v. Nasolo*, 364 Ill. App. 3d 26, 28, 847 N.E.2d 126, 128 (2006). Attorney Steven Woodrow helped author the winning brief in this landmark landlord/tenant appeal defining the requirements for constructive service and due process for Illinois evictions under the Illinois Forcible Entry and Detainer Act. 735 ILCS 5/9–107 *et seq.*
- *Fuentes v. Kroenke Sports & Entertainment, LLC*, Case No. 2014CV32619. Woodrow & Peluso appealed grant of summary judgment

in favor of defendant finding that the Colorado Consumer Protection Act, 6-1-701 *et seq.* does not allow for class actions. Case settled prior to the resolution of the appeal.

OUR ATTORNEYS

At present, our firm consists of 2 attorneys whose relevant experience is set forth below.

STEVEN LEZELL WOODROW has over a decade of experience advising consumers and small businesses in high stakes litigation.

Steven briefed and delivered the winning argument in the landmark federal appellate court decision *Wigod v. Wells Fargo Bank, N.A.*, 673 F.3d 547 (7th Cir. 2012) holding banks accountable for violations of the federal Home Affordable Modification Program. The opinion is widely regarded as the leading authority on the rights and obligations of HAMP servicers and borrowers. Steven also delivered the winning oral argument in *Robins v. Spokeo*, 742 F.3d 409 (9th Cir. 2014), a federal appeal upholding consumer rights under the Fair Credit Reporting Act against one of the nation's largest online data aggregators. The case is presently set for argument before the United States Supreme Court.

Mr. Woodrow was appointed lead class counsel in litigation against JPMorgan Chase Bank, N.A. challenging the bank's 4506-T HELOC suspension program and was appointed lead settlement class counsel in other HELOC suspension litigation against Wells Fargo Bank, N.A., Citibank, N.A., Chase, Bank of America, N.A. and PNC Bank.

Mr. Woodrow also led the legal team that secured a preliminary injunction freezing the U.S. assets of Mark Karpeles, the former head of the failed Bitcoin exchange known as Mt. Gox, as well as an order compelling Mr. Karpeles to personally appear in the United States for a deposition in connection with Mt. Gox's Chapter 15 bankruptcy case in Dallas Texas.

Steven has also litigated putative class actions under the Telephone Consumer Protection Act, and courts have appointed him to serve as class counsel in nationwide settlements against cellphone companies, aggregators, and mobile content providers related to unfair billing practices, including *Paluzzi v. Cellco Partnership*, *Williams v. Motricity, Inc.*, and *Walker v. OpenMarket Inc.*

Steven has also served as an Adjunct Professor of Law at the Illinois Institute of Technology Chicago-Kent College of Law, where he co-taught a seminar on class actions. Prior to founding Woodrow & Peluso, Steven was a partner at prominent class action technology firm in Chicago.

Before that, he worked as a litigator at a Chicago boutique where he tried and arbitrated a range of consumer protection, landlord tenant, and real estate matters.

EDUCATION

Chicago-Kent College of Law, J.D., High Honors, 2005

The University of Michigan—Ann Arbor, B.A, Political Science, *with Distinction*, 2002

ADMISSIONS

State of Colorado (2011)
State of Illinois (2005)
United States Court of Appeals for the Seventh Circuit
United States Court of Appeals for the Ninth Circuit
United States District Court, District of Colorado
United States District Court, District of New Mexico
United States District Court, Northern District of Illinois
United States District Court, Eastern District of Michigan
United States District Court, Western District of Michigan

PATRICK H. PELUSO specializes in plaintiff-side consumer class actions.

With a true passion for protecting consumers and their rights, Patrick aggressively pursues class action lawsuits against companies who violate those rights.

Through these lawsuits, he is able to force law-breaking companies to compensate the people they have harmed and correct their future practices. Patrick possesses the skills, strategic vision, and moxie to achieve excellent results for the people he represents. He has experience working with a broad range of consumer protection laws including the Fair Credit Reporting Act, the Telephone Consumer Protection Act, and various state consumer protection and consumer fraud statutes.

Patrick received his law degree from the University of Denver, Sturm College of Law where he was Editor-in-Chief of an academic journal. During law school, Patrick worked with a leading consumer class action law firm and held legal internships with a federal administrative judge and the legal department of a publicly traded corporation. Before law school, Patrick attended New York University, where he graduated with a B.S. and played on the school's club baseball team.

Patrick grew up in Baltimore, Maryland and now resides in Denver, Colorado.

EDUCATION

University of Denver, J.D. 2014
New York University, B.S.

ADMISSIONS

State of Colorado (2014)
United States District Court, District of Colorado
United States District Court, District of New Mexico