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THE HONORABLE ADRIENNE McCOY
Department 54
Noted for Hearing: March 4, 2024
With Oral Argument

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
COUNTY OF KING

COLUMBIA DEBT RECOVERY, LLC, a Washington
limited liability company,

Plaintiff/
Counterclaim-Defendant,

vs.

JORDAN PIERCE, an individual, and DONTE
GARDINER, an individual,

Defendants/
Counterclaim-Plaintiffs,

and

GUSTAVO CORTEZ, TOWANA PELTIER and
DARIUS MOSELY,

Third-Party Plaintiffs

vs.

COLUMBIA DEBT RECOVERY, LLC, a Washington
limited liability company,

Third-Party Defendant

NO. 20-2-16403-8 SEA

**DECLARATION OF SAM LEONARD IN
SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, COSTS AND SERVICE
AWARDS**

1 and
2 JORDAN PIERCE, DONTE GARDINER, THOMAS
3 G. HELLER, MARY ASHLEY ANCHETA,
4 BETHANY HANSON, MEGAN SHANHOLTZER,
CRYSTAL PAWLOWSKI, AND TALIA LUCKEN,

5 Third-Party Plaintiffs,

6 vs.

7 THRIVE COMMUNITIES MANAGEMENT,
8 LLC, a Washington limited liability
9 company, THRIVE COMMUNITIES, INC., a
10 Washington corporation, and BELKORP
HOLDINGS, INC., a Washington
Corporation d/b/a THE EDEN,

11 Third-Party Defendants.

12
13 I, Sam Leonard, declare as follows:

14 1. I am one of the attorneys of record for Plaintiffs in this action and the sole
15 member of Leonard Law, PLLC. I make this declaration based on my personal knowledge.

16 2. In this case, I have been the primary point of contact for Donte Gardiner and
17 Jordan Pierce. I have focused my efforts and time on defending them against CDR’s claims in
18 this case and in the pursuit of the class claims against CDR. I was the lead attorney on the
19 motion to vacate the default judgment taken against Mr. Pierce and Mr. Gardiner by CDR.

20 3. Early in this litigation, Mr. Gardiner and Mr. Pierce attempted to settle with CDR.
21 On October 14, 2020 they offered CDR a mutual release of all claims in return for \$44,350.
22 Attached hereto as Exhibit 1 is a true and correct copy of the email exchange regarding that
23 settlement offer. At the time the settlement offer was made, my fees were around \$30,000.
24 CDR rejected that offer and would only agree to a settlement whereby Mr. Pierce and Mr.
25 Gardiner paid CDR. Then in November 2022, the Defendants collectively offered a mutual
26 release of all claims and to pay \$20,000 to Mr. Gardiner and Mr. Pierce inclusive of attorneys’
27

1 fees and costs. Mr. Pierce and Mr. Gardiner rejected that offer stating that they were only
2 interested in settling on a class-wide basis. Attached hereto as Exhibit 2 is a true and correct
3 copy of the emails evidencing that exchange. The result of this settlement and the relief
4 obtained by the class is far superior to the settlement offers made by CDR.

5 4. Attached hereto as Exhibit 3 is a true and correct copy of my billing records
6 reflecting the time I have spent working on this matter through November 27, 2023. I have
7 segregated my time records into two groups. The first group of records documents my time
8 spent successfully obtaining vacating the default judgment against Mr. Gardiner and Mr. Pierce.
9 The second group of records reflects the time I spent on this case relating to the class claims
10 against CDR and CDR's claims against Mr. Pierce and Mr. Gardiner. My time spent on matters
11 that only concerned the claims brought against Thrive have been removed from these time
12 records and I do not seek any time that is solely related to the claims brought against Thrive.
13 My records do include some time spent related to Thrive's discovery responses, or lack thereof,
14 because Thrive's records were key to Mr. Gardiner's and Mr. Pierce's defense of CDR's claims
15 against them and necessary to support the CDR class representatives' claims that CDR was
16 attempting to collect prejudgment interest on unliquidated sums. Also, during the pendency of
17 this litigation, Defendants took the deposition of both Mr. Gardiner and Mr. Pierce, each
18 deposition lasting over four hours. I defended them at their depositions and seek compensation
19 for all of that time given that the depositions covered both the class claims against CDR and
20 CDR's claims against Mr. Pierce and Mr. Gardiner.

21 5. My costs in this matter are reflected in the second, third, and fourth rows of
22 Exhibit 3 and total \$327.56.

23 6. My billed time on this case does not reflect all of the hours that I have spent on
24 this matter, but instead it represents those hours that I believed to be reasonably billed related
25 to the claims brought against CDR and the defense of the claims CDR brought against Mr. Pierce
26 and Mr. Gardiner. For example, my records show that during the three plus years that this case
27 has been pending, I have sent nearly one thousand emails and received thousands more in this

1 case. While many, if not most, of those communications include compensable time, I have
2 excluded most of them from my time records and only included those that are most critical to
3 the claims and defenses related to CDR. In my estimation, this decision likely removes tens of
4 thousands of dollars in compensable time. I have chosen to remove these hours because most
5 of these communications included counsel for all defendants and segregating this time and
6 asking the Court to wade through this time, where only one defendant has settled, seems
7 burdensome for all of those involved. Regarding those emails that I have included in my billing
8 records, I have reviewed each email, and those emails are available for Court review in-camera
9 should there be any question regarding their import.

10 7. Attached hereto as Exhibit 4 is my August and September 2020 email exchange
11 with CDR's counsel regarding my request that CDR agree to vacate its judgment against Mr.
12 Gardiner and Mr. Pierce.

13 8. I have significant consumer protection litigation experience. Since starting my
14 practice in November of 2015, I have helped over 200 individuals in individual consumer
15 protection actions or debt defense actions. *See e.g. Pogrebinsky et al v. CACH, LLC*, Civ. No.
16 2:16-cv-01607-TSZ (W.D. Wash. 2016); *Weinkauf v. Veristone Mortg., LLC*, et al, Civ. No. 3:16-cv-
17 05471-RBL (W.D. Wash. 2016); *In re: Stephen Joseph Armstrong*, Civ. No. 16-10670-CMA (Bankr.
18 W.D. Wash. 2016); *Columbia Recovery Group, LLC v. Keva Dodd et al*, Case No. 16-2-23043-1
19 (King Co. Sup. Ct. 2016); *CACH, LLC v. Toby Smith*, Case No. 15-2-20977-9 (King Co. Sup. Ct.
20 2015); *Columbia Credit Servs., Inc. v. Russell Brandt*, 05-2-15410-1 (King Co. Sup. Ct. 2005);
21 *Brandt v. Columbia Credit Servs.*, No. C17-703RSM (W.D. Wash. 2017); *Columbia Recovery*
22 *Group, LLC v. Tanya Martin et al*, 16-2-24338-0 (King Co. Sup. Ct. 2016); *Columbia Debt*
23 *Recovery, LLC v. Jordan Pierce and Donte Gardiner*, 19CIV12217KCX (King Co. Dist. Ct. 2019);
24 *Fairway Collections, LLC v. Michael Turner*, 21-2-00097-14 (Grays Harbor Co. Sup. Ct. 2021).

25 9. I also have significant experience litigating consumer class actions. *See e.g. Dibb*
26 *et al v. AllianceOne Receivables Mgmt., Inc.*, No. 14-5835 RJB (W.D. Wash. 2014); *Bowen et al. v.*
27 *CSO et al.*, No. 2:17-cv-00677-JCC (W.D. Wash. 2017); *Esther Hoffman et al. v. Transworld*

1 *Systems, Inc. et al.*, No. 2:18 cv 1132-JCC (W.D. Wash. 2018); *David Zarza v. Midwest Recovery*
2 *Services, Inc. et al.*, Cs. No. 18-2-26378-6 (King Co. Sup. Ct. 2018); *Jammeh et. al. v. HNN*
3 *Associates, LLC, et al.*, Civ. No. 19-cv-00620-JLR (W.D. Wash. 2019); *Long et al. v. First Resolution*
4 *Investment Corp. et al.*, Cs. No. 19-2-11281-6 SEA (King Co. Sup. Ct. 2019); *Sanh v. Opportunity*
5 *Financial, LLC et al.*, Civ. No. 2:20-cv-00310-RSL (W.D. Wash. 2020); *David Buck et. al. v.*
6 *Northwest Commercial Real Estate Investments, LLC*, Cs. No. 21-2-03929-1 SEA (King Co. Sup. Ct.
7 2021); *Jennifer Demarre and Ryan Demarre v. Mutual of Enumclaw Insurance Co.*, Cs. No. 21-2-
8 10304-5 SEA (King Co. Sup. Ct. 2021). The class actions I have acted as counsel on have provided
9 relief to tens of thousands of Washingtonians and resulted in injunctive relief and payments to
10 class members that are valued at over 24 million dollars. I have also argued before the Ninth
11 Circuit Court of Appeals, successfully reversing the trial court's dismissal of a consumer
12 collection abuse putative class action. *See Hoffman v. Transworld Sys.*, No. 19-35058, 2020 U.S.
13 App. LEXIS 8677 (9th Cir. Mar. 19, 2020).

14 10. Currently I bill \$495 an hour on consumer class actions. My hourly rate is
15 reasonable based on my extensive experience, skill, and sophistication required for the types of
16 legal services typically performed and the rates customarily charged in the markets where my
17 legal services are typically performed. I have been approved at similar rates in other class
18 actions. For example, three years ago I was approved at \$400 an hour in another consumer
19 class action. Since that time, inflation has hovered around 7% and I have gained 3 years of
20 experience.

21 11. Around ninety percent of my current practice focuses on debt collection abuse
22 and debt defense cases. Primarily, I provide low-bono and contingent fee structures to my
23 clients who often cannot afford the current market rate for legal services. I am one of only a
24 handful of practitioners, that I know of, whose legal practice focuses on debt collection abuse
25 and debt defense litigation in cases not primarily related to foreclosure.

26 12. I received a B.A. from Central Washington University in Ellensburg, Washington
27 in 2004. In 2013, I received my J.D. cum laude from Seattle University School of Law, where I

1 was President of the Public Interest Law Foundation, and a clinic student in the Korematsu
2 Center Civil Rights Amicus Clinic. In 2014, I wrote an opinion article, “The bankruptcy trap in
3 student-loan debt,” which was published in The Seattle Times. I have also had published three
4 articles in the Washington State Association of Justice publication Trial News on litigating
5 consumer debt defense cases.

6 13. I am actively involved in professional organizations and nonprofits engaged in
7 consumer protection and debt collection abuse litigation. I am a member of the National
8 Association of Consumer Advocates and an Eagle member of the Washington State Association
9 for Justice. I am co-chair of the Washington Association of Justice’s Consumer Protection
10 Section. I am the Board Chair Elect of the Northwest Consumer Law Center, an organization
11 which is primarily focused on providing pro-bono and low-bono legal services to low and
12 moderate-income Washington residents relating to debt. I am also a member of the Public
13 Justice Foundation and was named a Super Lawyers Rising Star.

14 14. I actively participate and attend CLEs, conferences, and social justice talks that
15 focus on consumer law issues. I was a guest lecturer at Seattle University School of Law’s
16 Consumer Advocacy Clinic, where I spoke on Washington and federal debt collection law. In
17 2017, I was a presenter at a Washington State Association of Justice CLE, where I spoke on how
18 to run a successful consumer law practice. I have presented on the issue of debt collection
19 abuse twice during Social Justice Mondays held at Seattle University School of Law and taught a
20 Bankruptcy 101 class to students in Seattle University School of Law’s Moderate Means
21 program. I attended the Consumer Rights Litigation Conference hosted by the National
22 Consumer Law Center in 2014, 2016, 2018, 2019, 2022 and 2023. I was also a presenter at the
23 Consumer Rights Litigation Conference held in 2022. I have attended over 100 hours of
24 continuing legal education classes on consumer and debt collection abuse litigation. I also
25 mentor other consumer attorneys and law students looking to become consumer attorneys and
26 regularly co-counsel with attorneys new to the practice of consumer law and debt defense.

27

DECLARATION OF SERVICE

I, Blythe H. Chandler, hereby certify that on November 27, 2023, I caused true and correct copies of the foregoing to be served via the means indicated below:

Brad Fisher, WSBA #19895
Email: bradfisher@dwt.com
DAVID WRIGHT TREMAINE LLP
920 Fifth Avenue, Suite 3300
Seattle, Washington 98104
Telephone: (206) 622-3150
Facsimile: (206) 757-7700

- U.S. Mail, postage prepaid
- Hand Delivered via Messenger Service
- Overnight Courier
- Facsimile
- Electronic Mail
- King County Electronic Filing System

Jeffrey I. Hasson, WSBA #23741
Email: hasson@hassonlawllc.com
HASSON LAW, LLC
9385 SW Locust Street
Tigard, Oregon 97223
Telephone: (503) 255-5352
Facsimile: (503) 255-6124

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- Hand Delivered via Messenger Service
- Overnight Courier
- Facsimile
- Electronic Mail
- King County Electronic Filing System

*Attorneys for Plaintiff/Counterclaim-Defendant
Columbia Debt Recovery, LLC*

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Email: wwalsh@cozen.com
Karl Neumann, WSBA #48078
Email: kneumann@cozen.com
Email: krhym@cozen.com
Email: dmargulis@cozen.com
Email: dbowzer@cozen.com
COZEN O’CONNOR
999 Third Avenue, Suite 1900
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Telephone: (206) 340-1000

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- Hand Delivered via Messenger Service
- Overnight Courier
- Facsimile
- Electronic Mail
- King County Electronic Filing System

*Attorneys for Third-Party Defendants Thrive
Communities Management, LLC and Thrive
Communities, Inc.*

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*Attorneys for Third-Party Defendant
Belkorp Holdings, Inc., d/b/a The Eden*

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED this 27th day of November, 2023.

By: /s/ Blythe H. Chandler, WSBA #43387
Blythe H. Chandler, WSBA #43387

Exhibit 1

From: [Krista White](#)
To: [Sam Leonard](#)
Subject: Gardiner, Pierce ER 408 Settlement
Date: Wednesday, October 14, 2020 2:18:04 PM

Hello Sam,

We had a conversation with our client late yesterday to understand further any potential conflicting communications, liquidated damages, and the basis for the termination fee, in fine detail. Those allegations seem to be the basis for demanding \$44,350, as well as saving both Columbia Debt Recovery and Thrive Communities from the legal defense fees of defending the allegations. Your clients' claimed written agreement to release them is not supported by any written evidence, however. The communications log and email history between Thrive Communities and Jordan Pierce/Donte Gardiner has been reviewed. The only communications that can be found are quite contrary to your clients' claims. I welcome anything you can produce to help us understand a potential waiver of the debt, but Thrive only has communicated to us that their attempts to reach Jordan and Donte that were not responded to.

The liquidated damages of \$8,391.00 in the form of a termination fee is both a) contractually agreed to by your clients and b) based on actual historical damages at this particular apartment complex by tenants breaking their lease early. Nevertheless, our client has agreed that to save the legal defense fees by waiving the obligation of \$8,391.00, one-time, to lead to your client paying us a balance owed.

In the interest to spare the expense of substantial legal fees, we welcome a payment, though that does not seem to be the path your message is headed below. Let me know if I should calculate the balance with the removal of the \$8,391.00.

Respectfully,

Krista L. White
COLUMBIA DEBT RECOVERY, LLC
P. O. Box 3630
Everett, Wa. 98213
(425) 646-1382
Email: Kristaw@genesiscrd.com

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Krista,

Thanks for reaching out. I have spoken with my clients and they are confident in their chances of getting the judgment and order set aside, if not here then on appeal. They are also willing to take this as far as they have to, to get the judgment and order set aside. As to the underlying claims, notably, the District Court agreed that the early move-out penalty was high. I expect that to also be the opinion of other courts asked to review this case. The interest issue is also very straightforward and I suspect we will find the written agreement or a Thrive employee to testify to its existence.

That said, my clients have authorized me to offer a mutual release of all claims (the parties to the release would be my clients, CDR, Thrive and the property) in return for \$44,350. Of course, this offer requires the deletion of any tradeline and a dismissal with prejudice of the suit. This offer is open until the earlier of the close of business today, or the entry of an order by the Court regarding the motion to vacate. If we can come to an agreement in principal before the offer expires, I am prepared to submit a stipulated notice of settlement to the Court staying any order immediately upon agreement.

Please let me know.

Sam

Sam Leonard, Attorney at Law

Leonard Law

3614 California Ave SW, #151

Seattle, WA 98116

Ph. 206.486.1176

Fx. 206.458.6028

sam@seattledbtdefense.com<mailto:sam@seattledbtdefense.com>

www.seattledbtdefense.com<http://www.seattledbtdefense.com/>

[cid:image001.png@01D69E2E.9E536CC0][cid:image002.gif@01D69E2E.9E536CC0]

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From: Krista White <KristaW@genesiscred.com>

Sent: Tuesday, October 6, 2020 10:47 AM

To: Sam Leonard <sam@seattledbtdefense.com>

Subject: Jordan Pierce/Donte Gardiner

Hello Sam: While we wait for the judge's ruling, I would like to explore settlement of the account. Even if the judgment is vacated, I am confident that your clients will owe rent for December and January, the concession agreement for the 10 weeks of free rent, utilities and some amount of liquidated damages plus interest. You mentioned possible settlement of the case. Did you have something in particular in mind?

Respectfully,

Krista L. White
Columbia Debt Recovery, LLC
P. O. Box 3630
Everett, Wa. 98213
(425) 646-1382
Email: Kristaw@genesiscred.com<<mailto:Kristaw@genesiscred.com>>

This communication is from a debt collector, and any information obtained may be used for that purpose. The information in the e-mail message and any attachments is intended only for the personal and confidential use of the designated recipients named above or their designees. This message may be an attorney-client communication, attorney work product and/or joint defense privileged and as such is privileged and confidential. If the reader of this message is not the intended recipient or a designee, you are hereby notified that you have received this document in error, and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this message in error, please notify us immediately by telephone and delete the original message. Thank you.

Exhibit 2

Elliot,

Thank you for communicating the Counterclaim Defendants' settlement offer. Our clients decline the offer to settle their individual claims. They intend on pursuing class certification, and are always willing to consider settlement on a class wide basis.

We will be sending out letters in the next couple of days concerning outstanding discovery issues so that we can continue to move this case forward.

Sincerely,

Sam Leonard, Attorney at Law
Leonard Law, PLLC

LEONARD LAW, PLLC IS ON THE MOVE AGAIN
please send all mail to:

Leonard Law, PLLC
9030 35th Avenue SW ste 100
Seattle WA 98126
Ph. (206) 486-1176
Fx. (206) 458-1176
sam@seattledebtdefense.com<mailto:sam@seattledebtdefense.com>
www.seattledebtdefense.com<http://www.seattledebtdefense.com/>

[cid:image001.png@01D8FDC8.0A8A1E20] [cid:image002.gif@01D8FDC8.0A8A1E20]

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From: Elliot C. Copenhaver <copenhaver@carneylaw.com>

Sent: Wednesday, November 9, 2022 4:12 PM

To: Sam Leonard <sam@seattledebtdefense.com>; Beth Terrell <bterrell@terrellmarshall.com>; Blythe Chandler <bchandler@terrellmarshall.com>

Cc: Jodi Nuss <jnuss@terrellmarshall.com>; 'lopa@rockisland.com' <lopa@rockisland.com>; Pavey, Lori <LPavey@williamskastner.com>; Holly Rota <hrota@terrellmarshall.com>; 'hmandt@williamskastner.com' <HMANDT@williamskastner.com>; 'bradfisher@dwt.com' <BradFisher@DWT.COM>; Scott R. Weaver <weaver@carneylaw.com>; Elizabeth C. Fuhrmann <Fuhrmann@carneylaw.com>

Subject: ER 408 Settlement Communication - Columbia Debt Recovery v. Pierce, No. 20-2-16403-8 SEA

SETTLEMENT COMMUNICATION

SUBJECT TO ER 408

Sam,

I am writing you on behalf of Belkorp as well as Thrive and Columbia Debt ("Counterclaim Defendants"). Given the Court of Appeals ruling on the Motion for Discretionary Review, Counterclaim Defendants would like to renew our prior settlement offer to Mr. Gardiner and Mr. Pierce ("Tenants") before additional litigation costs are incurred by all parties.

As previously offered, Counterclaim Defendants will forgive the Tenants' outstanding debts, and will collectively pay \$20,000 (total) in fees and costs to Tenants. This offer will remain open until the close of business on Monday, November 21. If accepted, this offer will need to be documented in an appropriate long form agreement approved by all parties. We look forward to your response.

Thanks,

Elliot

Exhibit 3

CLASS ACTION LITIGATION

Date	Hours	Reduction	Billed Time	Description	Rate (\$)	Billable (\$)
11/2/2020	1	0.00%	1	Editing Counterclaims	495	495
11/3/2020	1	0.00%	1	Filing Fee - Counterclaims KCDC	83	83
11/3/2020	1	0.00%	1	Court Charge - Filing Counterclaims	2.07	2.07
11/9/2020	1	0.00%	1	Filing Fee KCSC	242.49	242.49
1/29/2021	0.4	0.00%	0.4	Meeting with opposing counsel RE discovery	495	198
3/16/2021	1.6	0.00%	1.6	Discovery conference with Thrive and CDR	495	792
3/16/2021	0.2	0.00%	0.2	Call with Co-counsel RE Next steps	495	99
3/16/2021	1	0.00%	1	Reviewing CDR Discovery Requests and Response Prep	495	495
3/22/2021	2.1	50.00%	1.05	Review Thrive Discovery Responses	495	519.75
3/29/2021	1	0.00%	1	Reviewing CDR responses	495	495
3/29/2021	0.3	0.00%	0.3	Drafting Correspondence to Co Counsel RE CDR Discovery	495	148.5
3/31/2021	1.1	0.00%	1.1	Call w client regarding discovery responses	495	544.5
4/8/2021	0.2	0.00%	0.2	Email to Thrive and CDR	495	99
4/19/2021	0.2	0.00%	0.2	Emailing with Client RE Discovery	495	99
4/26/2021	0.3	0.00%	0.3	Drafting discovery responses	495	148.5
4/27/2021	1	50.00%	0.5	Discovery call with Thrive	495	247.5
4/28/2021	2.6	0.00%	2.6	Drafting discovery responses	495	1287
5/5/2021	1.2	0.00%	1.2	Reviewing Client email accounts	495	594
5/5/2021	0.3	0.00%	0.3	Call with BC regarding emails	495	148.5
5/19/2021	0.8	0.00%	0.8	Call with Co counsel	495	396
5/19/2021	0.8	0.00%	0.8	Reviewing Pierce Emails located in TM search	495	396
5/20/2021	1.6	0.00%	1.6	Reviewing client records	495	792
5/20/2021	0.4	0.00%	0.4	Call with co-counsel re discovery	495	198
5/21/2021	0.4	0.00%	0.4	Call with client regarding discovery	495	198
5/21/2021	0.3	0.00%	0.3	Call with co-counsel re discovery	495	148.5
5/25/2021	0.5	0.00%	0.5	Emailing and talking with co-counsel on CDR discovery issues.	495	247.5
5/27/2021	1	0.00%	1	CDR discovery call	495	495
5/27/2021	0.8	0.00%	0.8	Reviewing client documents	495	396
5/28/2021	0.8	0.00%	0.8	Drafting discovery letter and reviewing CDR discovery	495	396
6/1/2021	0.6	0.00%	0.6	Reviewing Gardiner Emails	495	297
6/2/2021	1	0.00%	1	Call with Co-counsel RE Discovery, depositions and amendment.	495	495
6/3/2021	2.1	0.00%	2.1	Review Gardiner Email	495	1039.5
6/4/2021	0.2	0.00%	0.2	Emailing with co-counsel and opposing counsel regarding deposition scheduling	495	99
6/9/2021	0.8	0.00%	0.8	Strategy meeting - Discovery and class cert	495	396
6/9/2021	0.8	0.00%	0.8	Call with client regarding discovery	495	396
6/9/2021	0.4	0.00%	0.4	Reviewing CDR Discovery Responses	495	198
6/10/2021	0.2	0.00%	0.2	Editing discovery letter to CDR	495	99
6/10/2021	0.2	0.00%	0.2	Call with PA RE: Class Reps CDR	495	99
6/18/2021	1.8	0.00%	1.8	Preparing client supplemental responses	495	891

6/24/2021	0.8	0.00%	0.8 Preparing Gardiner Supplemental Production	495	396
6/24/2021	0.5	0.00%	0.5 Call with client regarding discovery	495	247.5
6/28/2021	0.2	0.00%	0.2 Reviewing Motion to Continue and Decl.	495	99
7/1/2021	0.3	0.00%	0.3 Emailing with clients	495	148.5
7/1/2021	0.2	0.00%	0.2 Emailing with co-counsel regarding MTA	495	99
8/3/2021	0.3	0.00%	0.3 Call with BC on status and next steps	495	148.5
8/5/2021	0.2	50.00%	0.1 Reviewing Thrive discovery responses and emailing with PA	495	49.5
8/5/2021	0.2	0.00%	0.2 Emailing with Co-counsel RE: [External] Pierce v. Thrive Communities Moveout Statement Revie	495	99
8/31/2021	1.6	0.00%	1.6 Gardiner Deposition Prep	495	792
8/31/2021	1.5	0.00%	1.5 Dep prep	495	742.5
9/1/2021	1	0.00%	1 Reviewing production from CDR	495	495
9/1/2021	0.8	0.00%	0.8 Legal Research Joint Defense Privilege	495	396
9/2/2021	5	0.00%	5 Jordan Pierce Deposition	495	2475
9/2/2021	1.2	0.00%	1.2 Jordan Pierce Deposition Prep	495	594
9/2/2021	1.1	0.00%	1.1 Deposition Prep	495	544.5
9/3/2021	4.2	0.00%	4.2 Dep. Donte Gardiner	495	2079
9/3/2021	0.6	0.00%	0.6 Reviewing client emails	495	297
9/7/2021	1.6	0.00%	1.6 Editing and drafting CDR Dep Questions.	495	792
9/7/2021	0.3	0.00%	0.3 Reviewing letter from Brad Fisher and drafting proposed response.	495	148.5
9/8/2021	5.5	0.00%	5.5 CDR Dep.	495	2722.5
9/9/2021	0.5	0.00%	0.5 Next steps and status	495	247.5
9/29/2021	1.2	0.00%	1.2 Letter to Thrive's Counsel RE Missing Emails Related to Client Defenses and CAA claims	495	594
9/30/2021	2.4	50.00%	1.2 Letter to Thrive's Counsel RE Missing Emails Related to Client Defenses and CAA claims	495	594
10/11/2021	1.3	0.00%	1.3 Reviewing transcript of Gardiner Dep	495	643.5
10/14/2021	2.1	0.00%	2.1 Drafting Declarations	495	1039.5
10/14/2021	0.3	0.00%	0.3 Call with client regarding declarations	495	148.5
10/15/2021	1.2	25.00%	0.9 Editing motion for cert .9, review and editing declarations .3	495	445.5
12/3/2021	0.8	50.00%	0.4 Reviewing and editing briefs.	495	198
2/25/2022	2	75.00%	0.5 Hearing - Motion for Certification	495	247.5
2/25/2022	0.3	50.00%	1.5 Call RE Motion for Certification Hearing	495	742.5
4/28/2022	1.8	50.00%	0.9 Editing Motion for Discretionary Review	495	445.5
10/19/2022	0.8	75.00%	0.6 Call with co-counsel RE Next Steps	495	297
10/20/2022	0.4	0.00%	0.4 Next Steps - Call with PA	495	198
10/26/2022	1.1	50.00%	0.55 Reviewing case history and preparing for status conference.	495	272.25
10/28/2022	0.3	50.00%	0.15 Status conference	495	74.25
11/17/2022	0.3	0.00%	0.3 Settlement offer	495	148.5
11/21/2022	0.5	0.00%	0.5 Calls regarding settlement offer and next steps	495	247.5
11/21/2022	0.8	50.00%	0.4 Calls regarding settlement offer and next steps	495	198
11/22/2022	0.6	0.00%	0.6 Drafting letter to HM regarding outstanding Thrive records related to CDR's claim against clients	495	297
12/21/2022	0.2	50.00%	0.1 Emailing with co-counsel RE Status of discovery	495	49.5
12/28/2022	1.9	50.00%	0.95 Editing TAC	495	470.25

1/3/2023	0.5	50.00%	0.25	Drafting email to PA regarding motion to compel and law section of brief.	495	123.75
1/3/2023	0.4	50.00%	0.2	Call RE Move to Amend	495	99
1/3/2023	1	50.00%	0.5	Drafting Motion to amend	495	247.5
1/4/2023	1.5	50.00%	0.75	Drafting Motion to amend	495	371.25
1/6/2023	1.8	50.00%	0.9	Editing Motion to Amend, Amended Counterclaims	495	445.5
1/23/2023	3.2	50.00%	1.6	Drafting Reply ISO Motion to Amend	495	792
1/30/2023	0.4	0.00%	0.4	Call RE CDR Strategy	495	198
2/7/2023	0.3	0.00%	0.3	Emails RE CDR	495	148.5
2/14/2023	0.5	0.00%	0.5	Meet and Confer with BF and JH RE CDR discovery responses	495	247.5
2/16/2023	0.5	80.00%	0.1	Editing 4th RFPs to Thrive	495	49.5
2/16/2023	2.8	50.00%	1.4	Editing Motion to Compel and Discovery to Thrive	495	693
2/27/2023	1.8	0.00%	1.8	Reviewing Discovery and Drafting Letter to CDR RE Discovery	495	891
3/10/2023	1	0.00%	1	Reviewing CDR Discovery Responses	495	495
3/28/2023	1	50.00%	0.5	Cert Motion Strategy and Discovery CDR and Thrive	495	247.5
3/29/2023	1.1	0.00%	1.1	Reviewing response to MTC and discovery in Jammeh for information on CDR's practices	495	544.5
3/30/2023	3.2	0.00%	3.2	Reviewing motion and facts in preparation of response.	495	1584
3/31/2023	1.3	0.00%	1.3	Drafting Reply on MTC to CDR	495	643.5
4/4/2023	0.5	0.00%	0.5	Reviewing CDR production RE class data	495	247.5
4/4/2023	0.5	0.00%	0.5	Drafting correspondence to opposing counsel regarding cross motions for cert on CDR and sched	495	247.5
4/5/2023	0.4	0.00%	0.4	Call with co-counsel RE Cert and CDR Records	495	198
4/11/2023	0.3	0.00%	0.3	Call with co-counsel RE CDR Discovery call	495	148.5
4/13/2023	0.3	0.00%	0.3	Emailing with co-counsel regarding briefing and discovery	495	148.5
4/14/2023	0.5	0.00%	0.5	Call with co-counsel RE CDR Discovery Responses	495	247.5
4/14/2023	0.6	0.00%	0.6	Call with opposing counsel RE Spoliation - CDR Putative class member account records	495	297
4/14/2023	1	0.00%	1	Drafting confirming letter to CDR	495	495
4/18/2023	0.3	0.00%	0.3	Call with co-counsel RE Responding to Motions to Deny Cert	495	148.5
4/19/2023	2.9	0.00%	2.9	Editing Motion to Amend	495	1435.5
4/20/2023	0.2	0.00%	0.2	Reviewing spreadsheet from CDR	495	99
4/20/2023	0.4	0.00%	0.4	Call with co-counsel RE CDR discovery	495	198
4/20/2023	1	0.00%	1	Drafting Motion to Amend	495	495
4/21/2023	6.1	0.00%	6.1	Drafting Response to CDR Motion to Deny Cert	495	3019.5
5/4/2023	0.8	0.00%	0.8	Legal Research on Response to CDR Motion to Deny Cert	495	396
5/5/2023	1.7	0.00%	1.7	Draft reply on MTA	495	841.5
5/5/2023	1.5	0.00%	1.5	Draft response MTDC	495	742.5
5/8/2023	6.8	0.00%	6.8	Drafting Reply on MTA	495	3366
5/9/2023	7.1	0.00%	7.1	Drafting Reply on MTA and Declaration	495	3514.5
5/11/2023	4.1	0.00%	4.1	Drafting Response to MTDC	495	2029.5
5/12/2023	2.6	0.00%	2.6	Drafting Response to MTDC	495	1287
5/14/2023	3.8	0.00%	3.8	Drafting Response to MTDC	495	1881
5/15/2023	1.2	0.00%	1.2	Drafting Response to MTDC	495	594
5/16/2023	6.2	0.00%	6.2	Drafting Response to MTDC	495	3069

5/20/2023	3.8	0.00%	3.8 Drafting Response to MTDC	495	1881
5/22/2023	7.8	0.00%	7.8 Drafting Response to Motion to Deny Cert	495	3861
5/23/2023	4.7	0.00%	4.7 Response to MTDC	495	2326.5
5/24/2023	0.3	50.00%	0.15 Call with Paul RE CDR brief and Thrive discovery responses related to CDR brief.	495	74.25
5/25/2023	2.3	0.00%	2.3 SL Declaration ISO Response to CDR MTDC	495	1138.5
5/30/2023	0.3	50.00%	0.15 Call with co-counsel regarding Response to motion to deny cert exhibits	495	74.25
5/30/2023	1.7	50.00%	0.85 Drafting disclosure of witnesses	495	420.75
6/5/2023	1.3	0.00%	1.3 Reviewing CDR's Reply and Supporting Declaration and emailing with co-counsel regarding strate	495	643.5
6/8/2023	4.6	0.00%	4.6 Hearing prep CDR MTN to Deny Cert	495	2277
6/9/2023	2.1	0.00%	2.1 Hearing prep CDR Motion to Deny Cert	495	1039.5
6/9/2023	1.7	40.00%	1.02 Hearing CDR Motion to Deny Cert 1.0 Thrive hearing motion to Deny Cert .7	495	504.9
6/23/2023	1	0.00%	1 Call with co-counsel RE Hearing	495	495
6/28/2023	0.5	0.00%	0.5 Call with co-counsel regarding settlement strategy	495	247.5
6/28/2023	0.2	0.00%	0.2 Editing demand	495	99
6/28/2023	0.2	0.00%	0.2 Call with DG and JP regarding settlement.	495	99
6/29/2023	0.2	0.00%	0.2 Editing settlement offer.	495	99
6/29/2023	0.2	0.00%	0.2 Drafting proposed response to CDR	495	99
7/10/2023	0.3	0.00%	0.3 Call regarding Proposed settlement	495	148.5
7/10/2023	0.6	0.00%	0.6 Reviewing CDR class data	495	297
7/10/2023	0.5	0.00%	0.5 Call with opposing counsel	495	247.5
7/10/2023	0.5	0.00%	0.5 Call with co-counsel regarding settlement strategy	495	247.5
7/12/2023	2.1	0.00%	2.1 Review CDR settlement spreadsheet and previous spreadsheets	495	1039.5
7/12/2023	0.8	0.00%	0.8 CDR data review	495	396
7/13/2023	0.5	0.00%	0.5 Call RE CDR Settlement Class Definition	495	247.5
7/18/2023	0.3	0.00%	0.3 CDR - Reviewing email from JH with counter offer and emailing with PA and BC regarding next ste	495	148.5
7/19/2023	0.3	0.00%	0.3 Call with Co-counsel RE Strategy on CDR and Status of Settlement Talks	495	148.5
7/20/2023	0.8	0.00%	0.8 Editing settlement and emailing with co-counsel of settlement strategy	495	396
8/9/2023	0.5	0.00%	0.5 Reviewing CDR offer and Class Data	495	247.5
8/16/2023	2.1	0.00%	2.1 Reviewing and editing settlement agreement with CDR	495	1039.5
9/8/2023	1.6	0.00%	1.6 Drafting Preliminary and Final Approval Orders	495	792
Total	197.8		182.37		\$89,115.71

VACATING DEFAULT JUDGMENT

Date	Hours	Activity category	Description	Rate (\$)	Billable (\$)
5/18/2020	0.2	EmailCommunication	File Information	495.00	99.00
5/21/2020	0.2	Email with Client	Preparing Motion to Vacate	495.00	99.00
5/27/2020	0.2	Email with Client	Preparing Motion to Vacate	495.00	99.00
5/27/2020	0.2	Email with Client	Preparing Motion to Vacate	495.00	99.00
7/13/2020	0.2	Call with Client	Facts - Motion to Vacate	495.00	99.00
7/17/2020	2.6	Drafting Filings	Motion to Vacate	495.00	1,287.00
7/17/2020	0.2	Email with Client	Documents regarding failure to serve and facts	495.00	99.00
7/20/2020	0.3	Factual Research	Researching Hurricane and Service Issues	495.00	148.50
7/20/2020	0.4	Call with Client	Facts and Documents MTV	495.00	198.00
7/20/2020	0.2	Email with Client	Facts and Documents MTV	495.00	99.00
7/21/2020	0.3	Drafting Filings	Motion to Vacate	495.00	148.50
7/27/2020	2.2	Drafting Filings	MTV and research	495.00	1,089.00
7/27/2020	0.2	Call with Co-Counsel	Call with PA regarding Motion to Vacate and CAA violatio	495.00	99.00
7/27/2020	0.4	Email with Client	Facts and Documents MTV	495.00	198.00
7/27/2020	0.2	Emailing with Client	Gardiner Motion to Vacate Documents and questions	495.00	99.00
7/27/2020	0.2	Email with Co-Counsel	CAA and CPA claims against CDR and claims against Thriv	495.00	99.00
7/28/2020	1.6	Drafting Filings	Drafting MTV and emailing with clients regarding facts	495.00	792.00
7/28/2020	0.5	Emailing with Client	Facts and Documents MTV	495.00	247.50
7/29/2020	0.4	Factual Research	Researching Hurricane - MTV	495.00	198.00
7/29/2020	1.2	Drafting Filings	MTV	495.00	594.00
7/29/2020	0.5	Emailing with Client	Facts and Documents MTV	495.00	247.50
7/30/2020	1	Call with Client	Call regarding researching whereabouts on the day of ser	495.00	495.00
7/31/2020	0.2	Emailing with Client	Forwarding Address	495.00	99.00
7/31/2020	0.2	Emailing with Client	Emails from The Eden	495.00	99.00
8/4/2020	3.2	Drafting Filings	Motion to Vacate	495.00	1,584.00
8/4/2020	0.2	Emailing with Client	Bank and Phone Records	495.00	99.00
8/4/2020	0.2	Emailing with Co-Counsel	Legality of interest and Early Move out Penalty	495.00	99.00
8/11/2020	1.1	Drafting Filings	MTV	495.00	544.50
8/13/2020	0.2	Emailing with Client	RE: Phone Bill & Bank statement	495.00	99.00
8/13/2020	0.2	Emailing with Client	Facts and Documents MTV	495.00	99.00
8/19/2020	0.4	Drafting Filings	MTV	495.00	198.00
8/19/2020	1.2	Drafting Filings	MTV	495.00	594.00
8/19/2020	0.2	Emailing with Client	Facts and Documents - RE: Flight Back	495.00	99.00

8/19/2020	0.2	Emailing with Client	RE: Questions to help with your case	495.00	99.00
8/19/2020	0.2	Emailing with Client	Emails with Thrive - Moveout Charges	495.00	99.00
8/21/2020	0.8	Drafting Filings	MTV	495.00	396.00
8/22/2020	1.4	Drafting Filings	MTV	495.00	693.00
8/26/2020	8.2	Drafting Filings	MTV & Gardiner Declaration	495.00	4,059.00
8/26/2020	0.2	Emailing with Clients	Status	495.00	99.00
8/26/2020	0.2	Emailing with Clients	Facts and Documents - One other question.	495.00	99.00
8/26/2020	0.2	Emailing with Clients	RE: One other question.	495.00	99.00
8/26/2020	0.2	Emailing with Co-Counsel	Draft CDR v. Gardiner - Motion to Vacate	495.00	99.00
8/26/2020	0.2	Emailing with Clients	Declarations	495.00	99.00
8/27/2020	2.3	Drafting Filings	MTV & Gardiner and Pierce Declarations	495.00	1,138.50
8/27/2020	0.2	EmailCommunication	RE: CDR v. Gardiner - Motion to Vacate	495.00	99.00
8/27/2020	0.2	Emailing with Co-Counsel	MTV Editing	495.00	99.00
8/27/2020	0.2	Emailing with Client	Gardiner Declaration	495.00	99.00
8/27/2020	0.2	Emailing with Client	More Questions	495.00	99.00
8/28/2020	0.6	Call with Client	Call with Jordan regarding declaration	495.00	297.00
8/28/2020	0.2	Emailing with Client	Draft Facts	495.00	99.00
8/31/2020	1.3	Drafting Filings	Declaration of Leonard, Proposed Order, Motion for Order	495.00	643.50
8/31/2020	0.2	Emailing with Co-Counsel	MTV and CAA violations	495.00	99.00
8/31/2020	0.2	Emailing with Co-Counsel	MTV and CAA violations	495.00	99.00
8/31/2020	0.2	Email with Opposing Counsel	CDR v. Jordan Pierce and Donte Gardiner - Notice of Appeal	495.00	99.00
8/31/2020	0.2	Email with Opposing Counsel	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appeal	495.00	99.00
8/31/2020	0.2	Email with Opposing Counsel	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appeal	495.00	99.00
8/31/2020	0.2	Emailing Co-Counsel	CDR v. Pierce and Gardiner - Motion to Vacate	495.00	99.00
9/9/2020	0.2	Email with Clients	Status Update	495.00	99.00
9/10/2020	0.2	Email with Opposing Counsel	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appeal	495.00	99.00
9/14/2020	0.2	Email with Opposing Counsel	RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appeal	495.00	99.00
9/14/2020	0.2	Email with Court - Hearing Scheduled	Request for Hearing - Columbia Debt Recovery v. Pierce et al	495.00	99.00
9/18/2020	0.1	Emailing with Co-Counsel	Hearing on MTV Status	495.00	49.50
9/21/2020	0.1	Emailing with Opposing Counsel	MTV Hearing	495.00	49.50
9/22/2020	0.2	Drafting/Reviewing Correspondence	Reviewing order regarding ex-parte filing from the court	495.00	99.00
9/22/2020	0.2	Emailing with Co-Counsel	RE: order regarding ex-parte filing	495.00	99.00
9/22/2020	0.2	Email with Court	Hearing schedule - Ex parte Order	495.00	99.00
9/22/2020	0.2	Emailing with Co-Counsel	RE: Gardiner v. CDR/Thrive	495.00	99.00
9/28/2020	0.5	Reviewing Opposing Party Pleadings	Response to Motion to Vacate	495.00	247.50

9/28/2020	1.2 Drafting Filings	Reply to Response to Motion to Vacate	495.00	594.00
9/28/2020	0.2 Email with Client	MTV - Moveout emails with Thrive	495.00	99.00
9/28/2020	0.2 Emailing with Co-Counsel	CDR's Response to MTV	495.00	99.00
9/28/2020	0.2 Emailing with Co-Counsel	CDR's Response to MTV	495.00	99.00
9/29/2020	6.8 Drafting Filings	Reply	495.00	3,366.00
9/30/2020	1 Drafting Filings	Editing Reply	495.00	495.00
9/30/2020	1 Drafting Filings	Supp. Decl. of Gardiner and Pierce	495.00	495.00
9/30/2020	0.2 Emailing with Co-Counsel	Reply edits	495.00	99.00
9/30/2020	0.1 Emailing with Opposing Counsel	Reply	495.00	49.50
10/1/2020	2.1 Hearing - Prep	MTV Hearing	495.00	1,039.50
10/1/2020	0.7 Hearing	Motion to Set Aside Default	495.00	346.50
10/1/2020	0.2 Email to Court Clerk	Reply does not appear in the docket	495.00	99.00
10/1/2020	0.1 Emailing with Co-Counsel	Hearing Over No Decision Yet	495.00	49.50
10/1/2020	0.2 Email with Clients	Hearing	495.00	99.00
10/1/2020	0.2 Email with Clients	Hearing	495.00	99.00
10/7/2020	0.2 Email with Co-Counsel	Settlement Offer	495.00	99.00
10/7/2020	0.2 Email with Clients	Settlement Offer	495.00	99.00
10/9/2020	0.3 Call with Client	Settlement Offer	495.00	148.50
10/9/2020	0.2 Email with Client	Settlement Offer	495.00	99.00
10/9/2020	0.2 Email with Opposing Counsel	Settlement Offer and Case Strength	495.00	99.00
10/13/2020	0.1 Email to Opposing Counsel	RE: Settlement Offer	495.00	49.50
10/13/2020	0.2 Email to Client	Settlement and Order Status	495.00	99.00
10/16/2020	0.2 Call with Client	Settlement Offer and Case Strength	495.00	99.00
11/2/2020	0.3 Reviewing Court Order	MTV - Order Granting	495.00	148.50
11/2/2020	0.2 Email with Clients	MTV Granted	495.00	99.00
11/2/2020	0.2 Emailing with Co-Counsel	MTV Granted	495.00	99.00
TOTAL	57.9			28,660.50

Exhibit 4

From: [Krista White](#)
To: [Sam Leonard](#)
Cc: [Shawna Nitschke](#)
Subject: RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appearance
Date: Thursday, September 10, 2020 10:35:01 AM
Attachments: [image001.png](#)

Thank you.

Respectfully,

Krista L. White
COLUMBIA DEBT RECOVERY, LLC
P. O. Box 3630
Everett, Wa. 98213
(425) 646-1382
Email: Kristaw@genesiscred.com

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From: Sam Leonard <sam@seattledebtdefense.com>
Sent: Thursday, September 10, 2020 10:33 AM
To: Krista White <KristaW@genesiscred.com>
Subject: RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appearance

Hey Krista,

No hearing. I spoke with the clerk yesterday and the Court cancelled the civil calendar again. I asked about the show cause motion and she said that the Court will be releasing a new procedure for scheduling hearings tomorrow and I should wait for that. I am holding off on trying to get the show cause hearing scheduled until I see the new procedure and will follow up with the clerk tomorrow or Monday. I will schedule the hearing for when you get back, as promised, but I don't know how to do that yet.

Stay tuned. Let me know if CDR will just agree to vacate. Have a good rest of your vacation.

Sam

LEONARD LAW HAS MOVED!
PLEASE SEND FUTURE MAIL TO
THE NEW ADDRESS BELOW
AND UPDATE YOUR RECORDS

Sam Leonard, *Attorney at Law*

Leonard Law
3614 California Ave SW, #151
Seattle, WA 98116
Ph. 206.486.1176
Fx. 206.458.6028
sam@seattledebtdefense.com
www.seattledebtdefense.com



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From: Krista White <KristaW@genesiscred.com>
Sent: Thursday, September 10, 2020 10:21 AM
To: Sam Leonard <sam@seattledebtdefense.com>
Subject: FW: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appearance

Please see below. Was a hearing held this morning?

Respectfully,

Krista L. White
COLUMBIA DEBT RECOVERY, LLC
P. O. Box 3630
Everett, Wa. 98213
(425) 646-1382
Email: Kristaw@genesiscred.com

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From: Krista White

Sent: Monday, August 31, 2020 4:59 PM

To: Sam Leonard <sam@seattledbtdefense.com>

Subject: RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appearance

Works for me.

Respectfully,

Krista L. White
COLUMBIA DEBT RECOVERY, LLC
P. O. Box 3630
Everett, Wa. 98213
(425) 646-1382
Email: Kristaw@genesiscred.com

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From: Sam Leonard <sam@seattledbtdefense.com>

Sent: Monday, August 31, 2020 4:58 PM

To: Krista White <KristaW@genesiscred.com>

Subject: RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appearance

Thanks. I don't want to interrupt. I just need to make sure I have it on the calendar on the earliest possible date because of the third *White* factor.

I am fine with moving it out two weeks until you get back provided CDR will agree to not start any garnishment proceedings or oppose the motion to vacate based on the argument that it was not brought in a timely matter.

If so, I can draft a stipulation to renote the hearing out two weeks that explains the move once the order to show cause is entered.

Let me know if you would like to do it that way. We all need vacation.

Sam

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Sam Leonard, *Attorney at Law*

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Fx. 206.458.6028

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From: Krista White <KristaW@genesiscred.com>
Sent: Monday, August 31, 2020 4:48 PM
To: Sam Leonard <sam@seattledebtdefense.com>
Subject: RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appearance

San Diego if you really want to interrupt! The 10th is ok then, as I will be staying some place that I know has wifi. I need to look at the case. If we don't agree to vacate, I will agree to email service of the show cause order.

Respectfully,

Krista L. White
COLUMBIA DEBT RECOVERY, LLC
P. O. Box 3630
Everett, Wa. 98213
(425) 646-1382
Email: Kristaw@genesiscred.com

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From: Sam Leonard <sam@seattledebtdefense.com>
Sent: Monday, August 31, 2020 4:46 PM
To: Krista White <KristaW@genesiscred.com>
Subject: RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appearance

My understanding is that they are doing them via Zoom and the clerk will contact us before the hearing to give us the information for logging in.

Have fun on vacation. Hopefully you are going somewhere nice.

Sam

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From: Krista White <KristaW@genesiscred.com>

Sent: Monday, August 31, 2020 4:39 PM

To: Sam Leonard <sam@seattledebtdefense.com>

Subject: RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appearance

I will review and let you know. I am on vacation that week and the next. Do you know if they are having in court hearings or by zoom? If by Zoom I can do it. Otherwise I am back 9/21.

Respectfully,

Krista L. White

COLUMBIA DEBT RECOVERY, LLC

P. O. Box 3630

Everett, Wa. 98213

(425) 646-1382

Email: Kristaw@genesiscred.com

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From: Sam Leonard <sam@seattledebtdefense.com>

Sent: Monday, August 31, 2020 4:28 PM

To: Krista White <KristaW@genesiscred.com>

Subject: RE: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appearance

Krista,

Please find attached:

Defendants' Motion to Set Aside Default Order and Judgment

Order to Set Aside Default [Proposed]

Declaration of Jordan Pierce In Support of Motion to Set Aside Default Order and Judgment

Declaration of Donte Gardiner In Support of Motion to Set Aside Default Order and Judgment

Declaration of Sam Leonard In Support of Motion to Set Aside Default Order and Judgment

Motion for Order to Show Cause

Order to Show Cause [Proposed]

Please let me know if Columbia is willing to voluntarily set aside the default order and judgment. I am requesting a hearing on September 10, 2020 at 8:45 am.

Let me know if you have any questions.

Thanks,

Sam

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From: Sam Leonard
Sent: Monday, August 31, 2020 4:18 PM
To: kristaw@genesiscrd.com
Subject: CDR v. Jordan Pierce and Donte Gardiner - Notice of Appearance

Krista,

Attached is my notice of appearance in the above matter.

Sincerely,

Sam Leonard

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