

The Honorable Michael Scott  
Noted for Consideration: March 4, 2024 at 8:30 a.m.  
With Oral Argument

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

COLUMBIA DEBT RECOVERY, LLC, a  
Washington limited liability company,  
  
Plaintiff/Counterclaim-  
Defendant,  
  
v.  
  
JORDAN PIERCE, an individual and DONTE  
GARDINER, an individual,  
  
Defendants/Counterclai  
nants/Third-Party  
Plaintiffs,  
  
and  
  
GUSTAVO CORTEZ, TOWANA PELTIER  
and DARIUS MOSELY,  
  
Third-Party Plaintiffs,  
  
v.  
  
COLUMBIA DEBT RECOVERY, LLC, a  
Washington limited liability company,  
  
Third-Party Defendant.

Case No.: 20-2-16403-8 SEA

DECLARATION OF JEFFREY I. HASSON  
IN SUPPORT OF COLUMBIA DEBT  
RECOVERY'S OPPOSITION TO  
DEFENDANTS' AND THIRD-PARTY  
PLAINTIFFS' MOTION FOR ATTORNEY  
FEES

DECLARATION OF JEFFREY I. HASSON IN SUPPORT OF  
COLUMBIA DEBT RECOVERY'S OPPOSITION TO  
DEFENDANTS' AND THIRD-PARTY PLAINTIFFS' MOTION  
FOR ATTORNEY FEES - 1  
Case No.: 20-2-16403-8 SEA

**HASSON LAW, LLC**  
Attorney at Law  
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1 and  
2 JORDAN PIERCE, DONTE GARDINER,  
3 THOMAS G. HELLER, MARY ASHLEY  
4 ANCHETA, RORY WALTON, BETHANY  
5 HANSON, MEGAN SHANHOLTZER,  
6 CRYSTAL PAWLOWSKI, and TALIA  
7 LUCKEN,  
8  
9 Third-Party Plaintiffs  
10 v.  
11 THRIVE COMMUNITIES MANAGEMENT,  
12 LLC, a Washington limited liability company,  
13 THRIVE COMMUNITIES, INC., a  
14 Washington corporation, BELKORP  
15 HOLDINGS, INC., a Washington corporation  
16 d/b/a THE EDEN,  
17  
18 Third-Party  
19 Counterclaim  
20 Defendants.

21 JEFFREY I. HASSON declares and states as follows:

- 22 1. I am co-counsel to Columbia Debt Recovery, LLC ("CDR"). I make this declaration  
23 based on personal knowledge.
- 24 2. I combined the attorney fees requested in each declaration in this case into one  
25 worksheet. I then sorted the entries by the date. A copy of that worksheet is attached as Exhibit A.
- 26 3. I extracted from that attorney fees requested based on work dedicated to co-  
Defendants Thrive and Belkorp. Those extracted fees are on the worksheet attached as Exhibit B.
4. Exhibit C is a worksheet of attorney fees allegedly incurred before May 22, 2023.
5. Exhibit D is a worksheet of the attorney fees allegedly spent on Pierce and  
Gardiner's Motion to Vacate the District Court Default Judgment against them.
6. Exhibit E is a worksheet of the attorney fees allegedly spent on the first counterclaim  
and motion to disqualify judge.
7. Exhibit F is a worksheet of the attorney fees allegedly spent on the second  
counterclaim.



**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court and sent a copy to the following via the method indicated:

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1 Dated this 22nd day of January, 2024.

2 s/ Brad Fisher  
3 Brad Fisher, WSBA #19895  
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