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**THE SPENCER LAW FIRM**  
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**Attorneys for Plaintiffs**

**UNITED STATES DISTRICT COURT,**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

MICHELL T. FRANKLIN,	) Case No. 8:18-cv-02085-SB-DFMx
KARA SAMPSON,	)
CYBELE A. MUNSON,	)
on behalf of themselves and all	) Complaint filed July 11, 2018
persons similarly situated,	) Trial Date:
	) Pre-Trial Date:
Plaintiff,	) Discovery Cutoff:
	) <b><u>Class Action</u></b>
v.	)
	) <b>DECLARATION OF KARA</b>
MIDWEST RECOVERY	) <b>SAMPSON IN SUPPORT OF</b>
SYSTEMS, LLC., ET. AL.,	) <b>MOTION FOR INCENTIVE</b>
	) <b>AWARD</b>
	) Hrng Date: September 24, 2021, 8:30am
	) Department 6C (1 <sup>st</sup> Street)
	) Hon. Stanley Blumenfeld, Jr.
Defendants.	)

1 I, KARA SAMPSON, hereby declare:

- 2 1. I am a Plaintiff in this lawsuit. I could and would competently testify to  
3 the below stated facts of my own personal knowledge if called as a witness.  
4
- 5 2. My current name is Kara Sampson, but I was formerly known as Kara  
6 Christensen and that is the name Midwest Recovery Systems knows me  
7 by.  
8
- 9 3. I agreed to join this lawsuit so that I can get restitution of money I paid  
10 and other victims paid to Midwest Recovery Systems and so that myself  
11 and all the other victims get damages for what Midwest or other  
12 responsible parties did to us.  
13
- 14 4. I understand this is a class action and I am one of the persons representing  
15 the "class" which is the people whose credit was damaged by Midwest  
16 Recovery and also those persons who paid money to Midwest to get the  
17 negative information removed from our credit reports.  
18
- 19 5. Back in December 2017, I received an alert from a credit monitoring  
20 service that alerted me to a new collection account on my credit report(s).  
21 The alert identified the collection agency as Midwest Recovery and  
22 provided a phone number. I called the phone number and spoke to  
23 someone who said he was working for Midwest Recovery. The employee  
24 claimed I owed over \$800 but if I paid \$408, he would remove the debt  
25  
26  
27  
28

- 1 from my credit report; otherwise, it would remain on my credit.
- 2 6. This supposed debt was for a payday loan I got years earlier in 2012 from
- 3 a shady loan company that I never heard from again. I did not think I
- 4 owed any money because it was too old and I'm not even sure the company
- 5 was legal.
- 6
- 7
- 8 7. Nevertheless, under duress, and in an effort to remove the damaging
- 9 adverse information, I paid the money. Shortly thereafter, the debt was
- 10 removed from my credit reports as promised.
- 11
- 12 8. I would not have paid any money on this supposed debt if Midwest
- 13 Recovery had not put it on my credit report.
- 14
- 15 9. I hired Lakeshore Law Center and Spencer Law Firm in June 2019 when
- 16 I learned that a lawsuit had been filed by them to recover money on behalf
- 17 of people Midwest Recovery coerced them to pay.
- 18
- 19 10. I was incredibly pleased to learn these lawyers were going after
- 20 Midwest Recovery, which I believed had violated my rights, but I simply
- 21 did not have the resources to fight on my own.
- 22
- 23 11. This case took much longer to resolve than I imagined it would, but I
- 24 stayed faithful to the original goal, which was to make Midwest Recovery
- 25 pay back the money it made this group of people (including me) pay.
- 26
- 27 12. During the lengthy prosecution of this case, I personally spent at least 50
- 28

1 hours of my time 1) gathering documents and information to provide  
2 counsel at the beginning of the case; 2) identifying payday lenders I had  
3 dealt with; 3) reviewing and responding to requests for production of  
4 documents; 4) meeting or conferring with counsel on multiple occasions;  
5 5) preparing for and testifying in a deposition; 6) assisting in the  
6 preparation of declarations for use in the certification proceedings and to  
7 oppose summary judgment; and 7) assisting my attorneys with the  
8 settlement process.

9  
10  
11  
12 13. I understand that Midwest Recovery is being required by the settlement  
13 to pay me and some 208 other victims 100% of the money we paid. I  
14 consider that a good result. I do not believe there is anything else I could  
15 have personally done to obtain a better result.  
16

17 I declare under penalty of perjury under the laws of the State of  
18 California and the United States that the foregoing is true and correct, except  
19 as to those matters stated on information and belief, and as to those matters,  
20 I believe them to be true.  
21

22 Executed on July 21, 2021, at Plumas Lake, California.

23  
24 By 

25 KARA SAMPSON  
26 Plaintiff  
27  
28