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11 SUPERIOR COURT FOR THE STATE OF CALIFORNIA

12 COUNTY OF SAN FRANCISCO

13 JOEL I. ROOS and TOM SANTOS, on
14 behalf of themselves and all others similarly
15 situated,

16 Plaintiffs,

17 v.

18 HONEYWELL INTERNATIONAL, INC.
19 and DOES 1-100, inclusive,

20 Defendants.

Case No. CGC-04-436205

**DECLARATION OF ALFRED T. WRIGHT
IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES AND
REIMBURSEMENT OF COSTS**

Date: May 2, 2014

Time: 9:00 a.m.

Dept: 304

Judge: Hon. Curtis E.A. Karnow

21 Attached hereto is a true and correct copy of the Declaration of Alfred T. Wright, filed in the
22 related case *Alfred Wright v. Honeywell International, Inc.*, Vermont Superior Court, Orange County
23 Case No. 201-11-04. This declaration is submitted in support of Plaintiffs' Motion for Attorneys'
24 Fees and Reimbursement of Costs.

25 Respectfully Submitted,

26 Dated: April 29, 2014

27 By: 

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Plaintiffs' Class Counsel

STATE OF VERMONT

SUPERIOR COURT
Orange County

CIVIL DIVISION
Docket No.: 201-11-04 Occv

ALFRED T. WRIGHT, on behalf of
himself and all others similarly situated

v.

HONEYWELL INTERNATIONAL INC.

)
)
)
) DECLARATION OF
) ALFRED T. WRIGHT
)
)

I, Alfred T. Wright, declare as follows:

1. I am the named plaintiff and class representative in the above-referenced matter. I make this declaration in support of Plaintiffs' Motion for Order of Preliminary Approval of Class Action Settlement in this case.
2. I have personal knowledge of the facts herein, and if called to do so, could and would competently testify thereto.
3. Between 1994 and 1999, I purchased three Honeywell Round Thermostats ("HRTs"), which were installed at my residence and my auto shop respectively in Strafford, VT.
4. I understand my responsibilities as a class representative and that I have a responsibility to act in the best interests of the class as a whole.
5. I am not aware of any factual or legal conflict that I may have with any other member of the class.
6. I have cooperated with and assisted my attorney in this case by reviewing the Complaint, the First Amended Complaint, and other pleadings and discovery requests, answering interrogatories, reviewing and producing documents, sitting for a deposition, and consulting with my attorney as needed.

7. I estimate that the total time I expended on this case from 2004 to the present is in excess of approximately 90 hours.

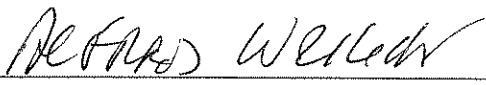
8. I am informed and believe that the approximate number of potential class members is in excess of thousands of individuals.

9. As I understand it, the claim that I have asserted regarding Defendant's representations concerning the Honeywell Round Thermostat product contains factual and legal issues common to class members. I, and members of the Class, are all alleging the same violations of Vermont Consumer Fraud Statute.

10. I have reviewed the Settlement Agreement, discussed it with my lawyers and believe that it is fair, reasonable, and adequate to class members.

I declare under penalty of perjury under the laws of the Vermont that the foregoing is true and correct.

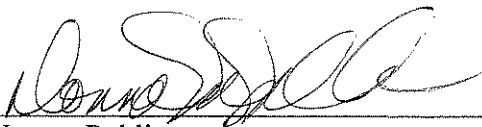
Executed this 3rd day of December, 2013, at Lebanon, NH



Alfred Wright

State of New Hampshire
County of Grafton

Personally appeared the above-named Alfred Wright and took oath that the foregoing statements made by him are true and accurate to the best of his knowledge and belief.



Notary Public
DONNA M. McCANN, Commissioner of Deeds
My Commission Expires September 28, 2016