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9 and the Certified Plaintiff Class
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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 (RAK)

**DECLARATION OF JOEL I. ROOS 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 I, Joel I. Roos, declare:

22 1. I am a resident of San Francisco, California, and am a member of the proposed
23 class in this action.

24 2. In 2007, I agreed to be a class representative in this action. To fulfill my
25 obligations as a class representative, I: (1) reviewed the complaint filed on my behalf in this
26 action; (2) attempted to gain access to my former apartment, which contained the Honeywell
27 Round Thermostat (HRT) that I had purchased in 1999; (3) attempted to located proof of my
28 purchase by searching my records and conducting other investigation; (4) searched for an HRT
purchased by my company, Urban Pacific, and located proof-of-purchase documentation for the

1 HRT located at San Rafael Commons, an apartment complex owned by Urban Pacific; (5)
2 obtained photographs of the HRT located at San Rafael Commons and produced those
3 photographs and what documentation I was able to located regarding that HRT to Defendant
4 Honeywell International, Inc. ("Defendant" or "Honeywell"); (6) spoke with my counsel about
5 this case on numerous occasions; (7) prepared for my deposition, including meeting with counsel
6 to prepare for my deposition; (8) sat for a deposition where I testified both as an individual and on
7 behalf of Urban Pacific, taken by counsel for Honeywell, which took most of the day on August
8 13, 2007; and (9) submitted declarations to the Court in support of Plaintiffs' positions with
9 respect to various motions.

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11 3. On February 8, 2008, I was officially substituted into this case as a class
12 representative. I understand that had I not agreed to take the previous class representative's place,
13 this lawsuit might have been terminated.

14 4. I have not received any benefits or compensation of any kind for my participation
15 in this litigation.

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17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct.

19 Executed this 18th day of March, 2014, at San Francisco, California.

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Joel I. Roos