

EXHIBIT 1:

Declaration of Judah Brownstein

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

Janyce LEWIS, Deborah COOPER, Clarissa FOLLEY,)
Harold FOLLEY, Earletta GLADDEN and Telambria TINSLEY,)
Individually and on behalf of all persons similarly situated and)
Charlottesville Public Housing Area Residents (PHAR))

Plaintiffs,

v.

) **Case No.: 3:12cv00026**

CHARLOTTESVILLE REDEVELOPMENT &)
HOUSING AUTHORITY,)

CONSTANCE DUNN, in her official capacity)
As the Executive Director of the Charlottesville)
Redevelopment and Housing Authority)

Defendants.

DECLARATION OF JUDAH BROWNSTEIN

I, Judah Brownstein, do hereby declare:

1. My name is Judah Brownstein. I am at least eighteen years of age. I have personal knowledge of the facts set forth herein and would testify to them if asked to do so.
2. I am the legal assistant charged with maintaining the database of public housing residents included on the Lewis et al. v. Charlottesville Redevelopment and Housing Authority (CRHA) class action lawsuit.
3. Between December 9 and the present, I have prepared and sent notifications to the residents affected by the class action settlement. I have also fielded phone calls from residents who had questions about the notices or who needed to update their addresses with the Legal Aid Justice Center.

4. The spreadsheet that I maintain includes records for 436 residents. According to this spreadsheet, 383 were sent a notification on or before November 27th, 2013. 45 of these notices were returned marked as undeliverable.
5. Of the remaining tenants that we were unable to reach, we found alternate addresses and sent out an additional 63 notices on December 11th, 2013. 17 of these notices were returned marked undeliverable.
6. On December 18th, we made a final mailing to 15 additional tenants whose addresses we found through phone calls. Four of these were returned. We also discovered inaccuracies in five notices and sent a correction on December 18th.

The chart below represents the three mailings, returned notifications, and the total tenants reached, as best we can tell.

Mailing date	Number of notices sent	Number of Notices Returned	Total Reached
11/25-11/27/2013	383	45	338
12/11/2013	63	17	46
12/18/2013	15 (+ 5 corrected notices)	4	11
Total			395/436

7. No individual has notified us that he or she desires to opt out of the settlement in response to our mailing.
8. The chart below reflects the time I have spent performing these clerical tasks. These records were recorded contemporaneously, and to the best of my knowledge and belief accurately reflect time I spent on this matter.

12/9/2013	Spreadsheet entry	Searched for addresses of those missing in spreadsheet	1.5
12/10/2013	Phone calls/spreadsheet maintenance	Returned phone calls/emails and updated spreadsheet with new contact information	4.25

12/11/2013	Mailing	Prepared second wave of mail notifications	3.0
12/12/2013	Phone calls/ spreadsheet maintenance	Returned phone calls/emails and updated spreadsheet with new contact information	2.5
12/17/2013	Phone calls/ spreadsheet maintenance	Returned phone calls/emails and updated spreadsheet with new contact information	3.25
12/18/2013	Mailing	Prepared corrected notifications/final mailing	4.5
1/2/2014	Phone calls/ spreadsheet maintenance	Returned phone calls and updated spreadsheet with new contact information	1.0
1/7/2014	Spreadsheet reports, declaration preparation	Reconciled recently returned notifications, prepared declaration	1.5
TOTAL HOURS			21.5
HOURLY RATE			\$85.00
TOTAL FEES			\$1827.50

10. We have mailed 468 notices to date, at a cost of \$0.46 postage per letter for a total of \$215.28.
11. The expected cost of sending the checks and accounting for the settlement checks will be at least \$800.00, which is projected to include the cost of postage and supplies as well as employee administrative time.
12. Based on inquiries to local attorneys and my knowledge of market rates for paralegals with comparable experience in the relevant market, I believe that a billing rate of \$85 per hour is reasonable and appropriate for my hours expended on this litigation.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 7th day of January, 2014, in Charlottesville, Virginia.


1-7-2014

Judah Brownstein

COMMONWEALTH OF VIRGINIA
CITY OF CHARLOTTESVILLE