

1 Thomas A. Kearney, State Bar No. 90045
tak@kearneylittlefield.com
2 Prescott W. Littlefield, State Bar No. 259049
pwl@kearneylittlefield.com
3 **KEARNEY LITTLEFIELD, LLP**
3436 N. Verdugo Rd., Suite 230
4 Glendale, California 91208
Telephone (213) 473-1900
5 Facsimile (213) 473-1919

6 Richard D. Lambert, State Bar No. 251148
rlambert@stonebargerlaw.com
7 **STONEBARGER LAW**
A Professional Corporation
8 101 Parkshore Dr., Suite 100
9 Folsom, CA 95630
Telephone (916) 235-7140

10 Attorneys for Petitioners/Plaintiffs
11

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **COUNTY OF LOS ANGELES**

14 SHEILA LINDERMAN, on behalf of herself,
15 and all others similarly situated,

16 Plaintiff,

17 v.

18 CITY OF LOS ANGELES, and DOES 1
19 through 100,

20 Defendants.

Case No. BC650785

(Consolidated with Case No. BS168155)

CLASS ACTION

**PUBLIC REDACTS - MATERIAL FROM
CONDITIONALLY SEALED RECORD -
DECLARATION OF MICHAEL J.
ZUCKERMAN IN SUPPORT OF
MOTION FOR ATTORNEYS' FEES,
COSTS, AND INCENTIVE AWARDS**

21 SHEILA LINDERMAN, on behalf of herself,
22 and all others similarly situated,

23 Petitioner,

24 v.

25 CITY OF LOS ANGELES, and DOES 1
26 through 100,

27 Respondents.

Date: February 26, 2020

Time: 11:00 a.m.

Judge: Hon. Amy D. Hogue

Dept.: 7 (Spring Street Courthouse)

Complaint filed: February 15, 2017

Trial Date: None set

1 I, MICHAEL J. ZUCKERMAN, declare as follows:

2
3 1. That I am a lawyer licensed to practice law in California and Minnesota. I am one of
4 the attorneys for Plaintiffs and the Class herein. I was involved in this matter since its inception. I
5 make this declaration in support of the Motion for an Award of Attorneys' Fees, Costs and Incentive
6 Awards in this action. If called as a witness, I would and could testify to the following.

7
8 2. I received my J.D. from UC Hastings in 1983 and was admitted to practice in 1983 in
9 California. I was admitted to practice in the Minnesota in 1990. I received my LL.M. (taxation) from
10 Loyola Law School, Los Angeles, in 2007. I am a certified specialist in estate planning, trust and
11 probate law by the State Bar of California Board of Legal Specialization. From approximately 1990 to
12 2003 I was a pro bono arbitrator, mediator and temporary judge for the Los Angeles Municipal and
13 Superior Courts. I have been AV rated by Martindale-Hubbell since 1997. From 1983 to 1986 I
14 worked as an insurance defense lawyer, and later worked as a plaintiff lawyer in addition to litigating
15 business transactions, collection matters and entertainment law disputes in the music and film industry.
16 From 1986 to 2011 I worked as an insurance defense lawyer outside and in-house, handling the
17 defense of all types of personal injury and property damage matters, coverage disputes, in addition to
18 litigating as a "plaintiff" in major case workers' compensation and property damage subrogation
19 matters. From 1988 to 2011 I was staff counsel for Aetna and Travelers, (Travelers is now a
20 conglomeration of UFS&G, St. Paul Insurance, Aetna Indemnity Company and Travelers Indemnity
21 Company). From 1996 to 2011 I was the designated major case lawyer for Travelers in Los Angeles
22 and surrounding counties. During that time the overwhelming majority of my cases involved wrongful
23 death, brain injury, vegetative state, and significant orthopedic injury matters, involved in premises,
24 product liability, trucking, and industrial and construction accidents. During that period of time I
25 worked for 2 years as a consultant to major case and catastrophic injury claim persons in the western
26
27
28

1 states, some of those matters involving class actions, providing trial and appellate strategy advice,
2 selection of major case defense counsel in those states, and a variety of other advisory issues in
3 multimillion dollar and up exposure cases. During the last 8 years I have practiced as a sole
4 practitioner, handling, for the most part, trust and estate litigation and some tax matters, in addition
5 plaintiff personal injury cases and transacrional cases, including being involved in a class action
6 matter and trying a class action fee dispute.
7

8 3. I have handled well over 1,200 to 1300 litigated matters, with at least 300-400 of those
9 involving amounts in controversy of \$2,000,000.00 and up. I have conducted binding arbitrations,
10 bench trials and jury trials.

11 4. I have spent 26 hours in prosecuting this case to date at the rate of \$500 per hour. A
12 compilation of my time is appended to this declaration.
13

14 I declare under penalty of perjury and of the laws of the State of California the foregoing is true
15 and correct and that this Declaration was executed on December 2, 2019 at Glendale, California.

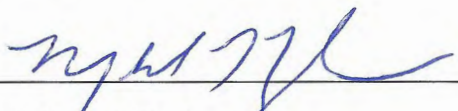
16 
17 _____
18 Michael J. Zuckerman

Exhibit A

REDACTED