

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

MELVIN CORNELIUS, on behalf of
himself and others similarly situated,

Plaintiff,

v.

DEERE CREDIT SERVICES, INC.,

Defendant.

Case No.: 4:24-cv-25-RSB-CLR

**DECLARATION OF STEVEN H. KOVAL IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEYS' FEES AND EXPENSES**

I, Steven H. Koval, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over 18 years of age and have personal knowledge of the facts set forth in this declaration, and could testify competently to them if called upon to do so.

Background and Experience

2. I am an attorney duly admitted to practice in the State of Georgia.

3. I have been admitted to practice before the United States District Courts for the Northern District of Georgia, Middle District of Georgia and Southern District of Georgia. I am in good standing in every court to which I am admitted to practice.

4. I have extensive experience in the prosecution of actions on behalf of consumers, particularly claims under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 (“FDCPA”), Fair Credit Reporting Act, 15 U.S.C. § 1681 (“FCRA”), and Telephone Consumer Protection Act, 47 U.S.C. §227 (“TCPA”). I have filed hundreds of actions on behalf of consumers in federal and state courts in Georgia.

5. I am a 1986 graduate of the Washington College of Law of American University and was admitted to the State Bar of Georgia in the same year.

6. Since 2007, my law practice has been focused primarily on representing consumers in FDCPA, FCRA and TCPA actions.

7. I have represented classes of consumers and been appointed class counsel as follows:

a. Mey v. Interstate National Dealer Services, Inc., et al., Civil Action No. 14-cv-01846-ELR, USDC, ND. Ga., a TCPA settlement of \$4,200,000 granted final approval on June 7, 2016;

b. Heidarpour v. Central Payment Co., Civil Action No. 16-cv-01215, USDC, MD. Ga., a TCPA settlement of \$6,500,000 granted final approval on May 4, 2017;

c. Randolph Jones, Jr. v. Advanced Bureau of Collections LLP, et al., Civil Action File No. 5:15-cv-00016-MTT, USDC, MD. Ga. Certification was contested. A FDCPA settlement that received final approval was entered on July 10, 2017;

d. Abante Rooter and Plumbing, Inc. v. Birch Communications, Inc., Civil Action File No. 1:15-cv-03562-AT, USDC, ND. Ga., a TCPA class settlement of \$12,000,000 granted final approval on December 14, 2017.

e. Rice-Redding v. Nationwide Mutual Insurance Co., Civil Action File No. 1:16-cv-03634-WMR, USDC, ND. Ga., a TCPA class settlement of \$5,000,000 granted final approval on July 24, 2019.

f. Chapman v. America's Lift Chairs, LLC, Civil Action File No. 4:21-cv-00245-RSB-CLR, USDC, SD. Ga., a TCPA class settlement of \$1,700,000 granted final approval on September 14, 2023.

8. I regularly lecture at state and national conferences on consumer law.

My past speaking engagements include:

National Consumer Law Center's 2018 Consumer Rights Litigation Conference (Denver) on Negotiating and Drafting Settlement Agreements;

National Consumer Law Center's 2016 FDCPA Conference (Miami) on reasonable attorney's fees in smaller value cases;

National Consumer Law Center's 2015 Consumer Rights Litigation Conference (San Antonio) on the effects of 1099s in consumers' claims;

National Association of Consumer Credit Administrators 2015 Annual Conference (Atlanta) on collection agency issues;

National Consumer Law Center's 2015 FDCPA Conference (San Antonio) on developing a FDCPA practice;

National Consumer Law Center's 2014 Consumer Rights Litigation Conference (Tampa) on managing a consumer law practice;

National Consumer Law Center's 2013 Consumer Rights Litigation Conference (Washington, D.C.) on the ABCs of the FDCPA;

National Consumer Law Center's 2013 FDCPA Conference (Baltimore) on errors to avoid in FDCPA practice and litigation;

National Consumer Law Center's 2012 Consumer Rights Litigation Conference (Seattle) on errors to avoid in consumer practice and litigation;

National Consumer Law Center's 2012 FDCPA Conference (New Orleans) on errors to avoid in FDCPA practice and litigation; and

National Consumer Law Center's 2010 FDCPA Conference (Jacksonville) on litigation privilege and other current FDCPA developments.

Work on This Matter

9. Work on this matter required me to spend time that could have otherwise been spent on other matters. I conducted the initial client interviews, participated in the pre-trial investigation, and reviewed and analyzed evidence. I attended the mediation and contributed to preparing the documents filed in this case.

10. I am the only attorney in my law firm, The Koval Firm, LLC.

11. My law firm handled this case on a contingency basis.

12. My law firm has received no payment for its work on this case to date.

13. My law firm has spent numerous hours working on this case.

14. In light of the risks inherent in class action litigation, including TCPA class action litigation, as well as my experience with large TCPA class settlements as identified above, it is my opinion that the pending settlement is an excellent result for consumers and members of the class. The settlement is at the top of the range of other TCPA settlements on a dollars-per-class-member basis.

15. To date, my firm has incurred reimbursable litigation costs and expenses in the total amount of \$724.48.

16. These expenses include fees related to travel for the final approval hearing.

SIGNED UNDER PAINS AND PENALTIES OF PERJURY THIS 9th DAY OF
DECEMBER, 2024.

/s/ Steven H. Koval
Steven H. Koval