

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA on behalf of himself
and others similarly situated,

Plaintiff,

V.

QUOTEWIZARD.COM, LLC

Defendant. _

Case No. 1:19-cv-12235-LTS-PK

**DECLARATION OF ALEX M. WASHKOWITZ IN SUPPORT OF
MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Alex M. Washkowitz, declare as follows:

1. I am an attorney duly admitted to practice in the Commonwealth of Massachusetts, I am over 18 years of age, I am competent to testify and make this affidavit on personal knowledge. I make this declaration in support of Plaintiff's Motion for an Award of Attorneys' Fees and for a Service Award for the Class Representative. In this declaration I will describe the work that I and my co-counsel have done in this case, and describe my experience in representing plaintiff classes in class actions, and cases brought under the 47 U.S.C. § 227, the Telephone Consumer Protection Act. ("TCPA").

2. I have been involved in representing Plaintiff in this case from the outset, from pre-trial investigation, analysis of Plaintiff's potential claims, and review of documents and discovery responses as well as depositions.

3. I have experience in the prosecution of claims under the Telephone Consumer

Protection Act, 47 U.S.C. §227. (“TCPA”). Based on my experience in TCPA class actions, I believe the proposed settlement in this case represents an excellent result for the proposed class and merits final approval by the Court.

4. My firm and that of my co-counsel have received no payment for fees and costs. Since beginning work on this case in October of 2019 my firm worked with no guarantee of being compensated for its time and efforts. Payment of my fees has always been contingent on successfully obtaining relief for the Plaintiffs and class members. As a result, there was a substantial risk of non-payment, particularly in light of the legal challenges involved in litigating this case. Work on this case has necessarily been to the exclusion of work on other matters that likely would have generated fees. I have also been denied use of the any such fees the course of this case

5. My firm has spent 410 hours prosecuting Plaintiff’s claims. Billed at my hourly rate of \$500.00, my firm’s hours yield a lodestar of \$205,000. I am familiar with the billing rates for attorneys with similar experience, particularly with expertise in matters arising under the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* and my billing rate is reasonable and is consistent with the rates of attorneys of similar experience and qualification. My firm additionally incurred \$385 in reasonable and necessary expenses in the litigation, including court reporter costs, expert fees, mediator fees, travel expenses, copying expenses and court charges

6. I am a 1999 graduate of Suffolk University Law School. Following graduation from law school, I have been employed as a full time Federal Law Enforcement Officer with the United States Government.

7. In August 2014, I co-founded the firm of CW Law Group, PC, focusing approximately one half of our practice on the representation of consumers for claims including the TCPA, and working with other more experienced firms in consumer class litigation.

8. I was appointed co-class counsel in Clough v. Revenue Frontier, 1:17-cv-00411-PB, a TCPA class action in which adversary class certification was granted, with a \$2,100,000 class action settlement approved on September 10, 2020.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE SIGNED UNDER PENALTY OF PERJURY OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT EXECUTED THIS 18th DAY OF JULY, 2025 IN THE COMMONWEALTH OF MASSACHUSETTS.

/s/ Alex M. Washkowitz
Alex M. Washkowitz