

EXHIBIT 3

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12 *Attorneys for Plaintiff and the Proposed Class*

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15 WESTERN DIVISION
16

17 JEFFREY A. THOMAS,
18 individually and on behalf of all
others similarly situated,

19 Plaintiff,

20 v.

21 DUN & BRADSTREET
22 CREDIBILITY CORP.,

23 Defendant.

Case No. CV15-03194 BRO (GJSx)

**DECLARATION OF JEFFREY A.
THOMAS IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION
FOR ATTORNEYS' FEES AND COSTS
AND CLASS REPRESENTATIVE
SERVICE AWARD**

Judge: Hon. Beverly Reid O'Connell

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I, Jeffrey A. Thomas, declare as follows:

1. I am a resident of Grants Pass, Oregon, and the named plaintiff in this
Action.

1 2. I first took steps to pursue this matter on October 7, 2013, when I sent
2 a cease-and-desist letter to Dun & Bradstreet Credibility Corp. (“DBCC”), which I
3 also provided to the FCC, the State of California Department of Justice, and the
4 Oregon Department of Justice. I conducted my own independent research into the
5 Telephone Consumer Protection Act and related consumer protection laws.

6 3. Since March 2015, I have been actively involved with this case. I
7 provided information to my attorneys that formed the basis of the Complaint. I
8 regularly consulted with my attorneys about the case’s status throughout the
9 litigation. My main goal in filing and prosecuting this case was to ensure that
10 DBCC would stop making unwanted, harassing calls to cellular telephones—a
11 result I am proud to say was accomplished through the lawsuit.

12 4. I submitted to extensive discovery in this case. In December 2015, I
13 was deposed by attorneys for DBCC, as was my business, which was represented
14 by my wife Julie. Julie and I spent several hours consulting with our attorneys,
15 both in person and by phone, in preparation for these depositions. In order to
16 prepare for and attend the depositions, we had to take time away from running our
17 small business, and we had to review telephone bills and correspondence relating to
18 several cellular telephone lines. Julie and I also worked with my attorneys to
19 provide documents and written responses to DBCC’s many discovery requests.

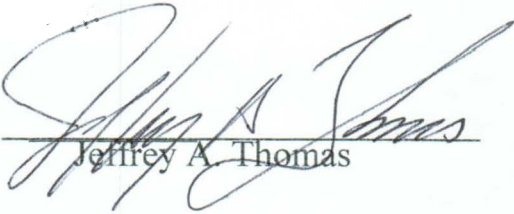
20 5. My attorneys regularly kept me abreast of the case’s progress,
21 including the prospect of resolving the case through mediation, which I supported.
22 I was apprised of the progress made toward settlement during the June 2, 2016
23 mediation session, and after reviewing and approving the proposed settlement
24 terms, authorized my attorneys to accept the mediator’s proposal. This resulted in
25 an agreement in principle on June 10, 2016.

26 6. I reviewed the Settlement Agreement in early September 2016 and
27 approved its terms. In my view, the proposed Settlement is a great result for the
28 Class: it ensures that users of cellular phones called by DBCC will receive

1 compensation, and most importantly to me, it guarantees that DBCC will not make
2 similar calls in the future. While bringing this case required my time and effort, I
3 am proud of my role in the litigation and well satisfied with the result.

4 I declare under penalty of perjury of the laws of Oregon and the United
5 States that the foregoing is true and correct, and that this declaration was executed
6 in Grants Pass, Oregon on December 6, 2016.

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Jeffrey A. Thomas