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UNITED STATE FOR THE NORTHERN I	S DISTRICT COURT DISTRICT OF CALIFORNIA CISCO DIVISION
IN RE: ROUNDUP PRODUCTS LIABILITY LITIGATION THIS DOCUMENT RELATES TO: Pennie, et al., v. Monsanto Co., et al., Case No. 3:17-cv-01711-VC	MDL No. 02741 DECLARATION OF PEDRAM ESFANDIARY IN SUPPORT OF REPLY AND REQUEST FOR ATTORNEY FEES & ASSOCIATED COSTS
	mbaum@baumhedlundlaw.com R. Brent Wisner, Esq. (SBN: 276023) rbwisner@baumhedlundlaw.com Frances M. Phares, Esq. (LA #10388) fphares@baumhedlundlaw.com Pedram Esfandiary (SBN: 312569) pesfandiary@baumhedlund.com BAUM, HEDLUND, ARISTEI & GOLDMAN, P.C. 12100 Wilshire Blvd., Suite 950 Los Angeles, CA 90025 Telephone: (310) 207-3233 Facsimile: (310) 820-7444 Nicholas R. Rockforte (LA #31305) nrockforte@pbclawfirm.com Christopher L. Coffin (LA #27902) ccoffin@pbclawfirm.com Jonathan E. Chatwin (LA #36410) jchatwin@pbclawfirm.com PENDLEY, BAUDIN & COFFIN, LLP 1515 Poydras Street, Suite 1400 New Orleans, LA 70112 Telephone: (504) 355-0086 Facsimile: (504) 523-0699 Attorneys for Plaintiffs UNITED STATE FOR THE NORTHERN I SAN FRANC IN RE: ROUNDUP PRODUCTS LIABILITY LITIGATION THIS DOCUMENT RELATES TO: Pennie, et al., v. Monsanto Co., et al.,

I, Pedram Esfandiary, declare as follows:

- 1. I am an attorney licensed to practice in the State of California and admitted to practice before this Court. I am an attorney at the law firm of Baum, Hedlund, Aristei & Goldman, P.C., and counsel of record for Plaintiffs, Loretta Pennie, *et al.*, ("Plaintiffs") in the above-referenced action. I make this declaration based on my personal knowledge, and, if called as a witness, I could and would testify competently to these matters.
- 2. My hourly rate for work undertaken as an associate attorney for Baum, Hedlund, Aristei & Goldman is \$300. This hourly rate is based upon my experience and background. I received my LL.B, M.A., and LL.M from universities in the United Kingdom and the University of Southern California. I devoted a total of 32 hours to conducting legal research and writing the Motion for Remand and the Reply to Monsanto's Opposition to Remand. My fees total \$9,600.
- 3. The hourly rate of Fran Phares, who is "of counsel" to Baum, Hedlund, Aristei & Goldman, is \$600. A graduate of Tulane Law School, Ms. Fares has over 30 years of practice experience, including as a former Assistant District Attorney and as a Law Clerk for the 22nd Judicial District Court in St. Tammany and Washington parishes, Louisiana. Ms. Fares devoted a total of 25 hours researching, writing, and reviewing the Motion for Remand. Her fees total \$15,000.
- 4. The hourly rate of my supervising attorney, R. Brent Wisner is \$550. Mr. Wisner is a graduate of UCLA and Georgetown Law Center, is a former Law Clerk for the Honorable Helen Gillmor in the U.S. District Court for the District of Hawaii, has 7 years of extensive experience in pharmaceutical, mass tort, and personal injury litigation, and is a shareholder at Baum, Hedlund, Aristei & Goldman. Mr. Wisner devoted a total of 11.5 hours reviewing and contributing to the Reply to Monsanto's Opposition to Remand. His attorney fees total \$6,325.
- 5. The hourly rate of attorney Michael Baum is \$750. A graduate of UCLA Law School, Mr. Baum is the senior managing shareholder of Baum, Hedlund, Aristei & Goldman, and has successfully led the firm through numerous wrongful death and personal injury cases, with over 30 years of experience. He devoted a total of 1 hours to reviewing the Reply to Monsanto's Opposition to Remand. His attorney fees total \$750.

- 6. The hourly rate of paralegal Samantha Jison is \$150. Ms. Jison has 9 years of extensive paralegal experience. Ms. Jison's devoted a total of 2 hours reviewing, formatting, and filing the Motion for Remand and Reply to Monsanto's Opposition to Remand. Her paralegal fees total \$300.
- 7. I anticipate that the preparation, travel, and argument associated with the Motion for Remand will involve a three additional hours of attorney-work by myself and Mr. Wisner. That adds an additional \$2,550.
 - 8. The cost of two plane flights from Los Angeles to San Francisco are \$422.80. See Exh. A1.
- 9. Thus, the total attorney & paralegal fees and costs associated with bringing the Motion for Remand are \$34,947.80.
 - 10. The following chart summarizes the information within this declaration:

Description	Quantity	Total
Pedram Esfandiary, Esq	32 + 3 hrs. x \$300	\$10,500
Fran Phares, Esq	25 hrs. x. \$600	\$15,000
Brent Wisner, Esq	11.5 + 3 hrs. x \$550	\$7,975
Michael Baum, Esq.	1 hr. x \$750	\$750
Samantha Jison (paralegal)	2 hrs. x \$150	\$300
Costs for travel to San Francisco	2 plane tickets from LAX to SFO	\$422.80
	GRAND TOTAL:	\$34,947.80

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of May 2017, at Los Angeles, California.

/s/ Pedram Esfandiary
Pedram Esfandiary

CERTIFICATE OF SERVICE I, Pedram Esfandiary, hereby certify that, on May 12, 2017, I electronically filed the foregoing with the Clerk for the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to counsel of record. /s/ Pedram Esfandiary Pedram Esfandiary