

1 Michael W. Sobol (State Bar No. 194857)  
2 Roger N. Heller (State Bar No. 215348)  
3 Nicole D. Sugnet (State Bar No. 246255)  
4 LIEFF CABRASER HEIMANN  
5 & BERNSTEIN LLP  
6 275 Battery Street, 29th Floor  
7 San Francisco, CA 94111  
8 Telephone: (415) 956-1000

9 Daniel M. Hattis (State Bar No. 232141)  
10 Kirill M. Devyatov (State Bar No. 293106)  
11 HATTIS LAW  
12 2300 Geng Road, Suite 200  
13 Palo Alto, CA 94303  
14 Telephone: (650) 980-1990

15 John A. Yanchunis (admitted pro hac vice)  
16 J. Andrew Meyer (admitted pro hac vice)  
17 MORGAN & MORGAN  
18 COMPLEX LITIGATION GROUP  
19 201 North Franklin Street, 7th Floor  
20 Tampa, FL 33602  
21 Telephone: (813) 223-5505

22 *Class Counsel*

23 UNITED STATES DISTRICT COURT  
24  
25 NORTHERN DISTRICT OF CALIFORNIA  
26

27 IN RE TRACFONE UNLIMITED  
28 SERVICE PLAN LITIGATION

Lead Case No. 13-cv-03440-EMC

Consolidated Cases:  
13-cv-05295-EMC  
13-cv-05296-EMC  
14-cv-01347-EMC

**DECLARATION OF DAVID HANSELL IN  
SUPPORT OF MOTION FOR AWARD OF  
ATTORNEYS' FEES AND EXPENSES  
AND FOR SERVICE AWARDS FOR  
PLAINTIFFS**

Date: June 23, 2015  
Time: 2:30 p.m.  
Judge: Hon. Edward M. Chen

1 I, David Hansell, declare as follows:

2 1. I am one of the named plaintiffs and class representatives in the above-captioned  
3 case. I submit this declaration in support of Plaintiffs' motion for final approval of class action  
4 settlement and in support of the request for service awards. The facts set forth herein are true and  
5 based on my own personal knowledge, except where based upon a review of the relevant  
6 pleadings and records. I have personal knowledge of the facts set forth herein, and if called to  
7 testify thereto, I could and would do so competently.

9 2. In July 2012, having seen representations for a Straight Talk "unlimited" mobile  
10 phone plan, and based primarily on the promise of the plan including "unlimited" data, I  
11 purchased a Straight Talk SIM card, along with an "Unlimited 1 Year" service plan for \$495.00  
12 plus tax, from TracFone's website straighttalk.com. I was later surprised to find my data service  
13 cut-off. I contacted customer service to complain, and I received an email response that my data  
14 service would not be restored until my 1-Year service plan expired. Despite having prepaid for  
15 the service, I could not afford to go without cellular data, and I transferred my phone service to  
16 another provider. Based on my experience I decided to file a lawsuit against Defendants and  
17 agreed to be a class representative in this case, undertaking the burdens and risks associated with  
18 litigation, to help put a stop to what I believed were Defendants' wrongful and deceptive  
19 practices.  
20

21 3. Pursuant to my duties as a plaintiff and class representative, I have been actively  
22 engaged in this case. Among other things, I have provided information to my attorneys about my  
23 experience, reviewed the allegations in the complaint, and consulted with Class Counsel multiple  
24 times during the course of the case, staying updated about the status of the case and the settlement  
25 negotiations. In all, although I have not maintained records of the time spent participating in this  
26 case, I estimate that I spent approximately 10 hours working on this case.  
27  
28

