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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE GOOGLE INC. GMAIL LITIGATION

Master Docket No.: 13-MD-02430-LHK

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF PROPOSED CLASS
COUNSEL RICHARD M. GOLOMB IN
SUPPORT OF PLAINTIFFS'
CONSOLIDATED MOTION FOR CLASS
CERTIFICATION**

Date: January 16, 2014
Time: 1:30 p.m.
Judge: Hon. Lucy H. Koh
Place: Courtroom 8—4th Floor

Trial Date: October 20, 2014

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**DECLARATION OF PROPOSED CLASS COUNSEL RICHARD M. GOLOMB IN
SUPPORT OF PLAINTIFFS' CONSOLIDATED MOTION FOR CLASS
CERTIFICATION**
5:13-MD-002430-LHK

1 I, RICHARD M. GOLOMB, declare that:

2 1. I am managing shareholder and founding partner of Golomb & Honik, P.C. I
3 graduated from American University with a B.A. in Political Science in 1980. I received my
4 Juris Doctor degree from Nova Southeastern University Law School in 1983. I have been
5 admitted to practice law in the State of New Jersey and the Commonwealth of Pennsylvania
6 since 1984 and 1985 respectively. Since 1998, I have been a shareholder in Golomb & Honik,
7 P.C., where I have served clients nationwide in the areas of consumer class action litigation,
8 pharmaceutical litigation, mass torts, and personal injury. I have served as president of the
9 Philadelphia Trial Lawyers Association and I currently sit on the Board of Governors of the
10 Pennsylvania Association for Justice. I also served as an officer of the American Association
11 for Justice for three years. I was part of the legal team that was recently named as a finalist for
12 the 2012 Trial Lawyer of the Year Award in connection with my work on behalf of wronged
13 consumers against three dozen banks. I have extensive experience in the litigation of class
14 action claims under consumer protection statutes.

15 2. I have been involved in this litigation since November 2012. Prior to the
16 establishment of this MDL in April 2012 I worked extensively in prosecuting *Knowles v.*
17 *Google Inc.*, *Scott v. Google Inc. (Scott II)*, and *Brinkman v. Google Inc.* I worked with co-
18 counsel to respond to Google's MDL petition, and to develop a workable and efficient plan for
19 the conduct of the plaintiffs' cases in the event of consolidation or coordination by the Judicial
20 Panel on Multi-District Litigation. Shortly after the MDL was established, I was appointed to
21 serve on the Plaintiffs' Executive Committee. I have worked closely with Lead Counsel and the
22 other members of the Plaintiffs' Executive Committee in all of the briefing presented to the
23 court, and on discovery. The Court is aware of the work product that has been presented on
24 behalf of Plaintiffs in this MDL, and I defer to this Court's judgment regarding the quality of
25 representation by counsel in the MDL to date. I seek appointment as Class Counsel in this
26 action.

27 3. I was appointed to the Plaintiffs' Executive Committee in *In Re: Checking*
28 *Account Overdraft Litigation*, Southern District of Florida, Case No. 09-MD-02036-JLK. In

**DECLARATION OF PROPOSED CLASS COUNSEL RICHARD M. GOLOMB IN
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1 this capacity and along with co-counsel, I litigated a consumer class action on behalf of bank
 2 customers against several of the country's largest banking institutions. My activities in
 3 connection with that litigation included: 1) pre-litigation investigation; 2) pleading and motion
 4 practice; 3) discovery; 4) appeals arising due to the certification of a national class; 5)
 5 exhaustive and lengthy settlement negotiations which led to multi-million dollar settlements;
 6 and 6) approval of and judgment on class action settlements.

7 4. I have served as counsel in more than 50 cases that resulted in million-dollar and
 8 multimillion-dollar verdicts and settlements for individual and class action clients.

9 5. I have worked with Ronald Kovler in this action. Mr. Kovler has participated
 10 actively in this litigation to this point, assisting in the preparation of documents including
 11 complaints and declarations, putting together documents and information necessary in
 12 anticipation of written discovery requests, and communicating with me and co-counsel in a
 13 timely fashion as is necessary. It is my firm belief that he is willing and able to continue
 14 participating actively in this litigation toward the common goal of fair and reasonable class
 15 relief, and stopping Google's alleged violations of state and federal privacy laws.

16 I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania
 17 that the foregoing is true and correct, and that I have personal knowledge of the matters stated in
 18 this declaration. If called as a witness, I could and would testify competently as to those
 19 matters.

20 Executed on this 24th day of October, 2013 at Philadelphia, Pennsylvania.

21 /s/ Richard M. Golomb
 22 RICHARD M. GOLOMB
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