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17	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
18	COUNTY OF	F LOS ANGELES
19	ZENIA OCANA, et al.,	Case No. BC701809
20	Plaintiffs,	Related Case No. BC701810
21	v.	Honorable William Highberger
22	RENEW FINANCIAL HOLDINGS, INC., et al.,	DECLARATION OF STEPHANIE CARROLL IN SUPPORT OF MOTION
23	Defendants.	FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT
24 25		[Filed concurrently with Notice of Motion and
26		Motion for Preliminary Approval of Class Action Settlement; Declaration of Michael M. Maddigan; and [Proposed] Order Granting
27		Preliminary Approval of Class Action Settlement
28		

6. In pursuing this case for over five years, including defending against two

demurrers, successfully pursuing this matter in the Court of Appeal, participating in discovery,

I, Stephanie Carroll, declare:

1. I am a member in good standing of the State Bar of California and am admitted to practice before both the Central and Northern Districts of California. I am the Directing Attorney of the Consumer Rights and Economic Justice project at Public Counsel. Public Counsel is one of the law firms representing Plaintiffs Zenia Ocana, Juan Ocana Lau, Violeta Senac, Maria Alvarez, Reginald Nemore, Aurelia Millender, and Allen Bowen, individually and on behalf of all others similarly situated, in related case numbers BC701809 and BC701810. I have personal knowledge of the facts stated in this declaration and would, if called as a witness, competently testify to those facts.

BACKGROUND ABOUT PACE CLIENTS AND THESE ACTIONS

- 2. I have held my current position for three years. I have been personally involved in the *Ocana* and *Nemore* cases since their inception. Prior to filing the original Complaint, Public Counsel was contacted by scores of homeowners seeking legal assistance related to PACE liens that the homeowners did not even realize they had agreed to until they received their property tax assessments.
- A significant number of the homeowners who contacted Public Counsel had assessment contracts through the Los Angeles County program with Renew Financial and Renovate America.
- 4. In addition to Public Counsel's own client intake process, I also have learned about homeowners adversely impacted by the PACE program through the Clean Energy Justice coalition, to which Public Counsel belongs.
- 5. To date, Public Counsel has assisted and heard from over 350 Los Angeles County homeowners with around 500 liens. Based on our analysis of the individuals who have contacted Public Counsel, at least 151 of those homeowners are class members, who have a total of approximately 209 liens through Renew Financial and Renovate America.

and pursuing this matter through months of settlement discussions, I believe that I and the other Class Counsel have demonstrated a high degree of skill in the litigation of the issues and that we have achieved an outstanding result for the Class.

PUBLIC COUNSEL ATTORNEY TIME AND EXPERIENCE

- 7. I began my legal career as a barrister in England in 2004, practicing criminal and immigration law. From 2006 until 2008, I worked as an independent contractor working with teams of attorneys litigating cases before the International Criminal Tribunals in The Hague and Sierra Leone. I became a member of the California Bar in 2009 and worked (for Paul Hoffman) at Schonbrun DeSimone Seplow Harris and Hoffman from April-September 2009. While working for Mr. Hoffman, I focused on civil litigation and appellate work, and drafted a prevailing appellate brief.
- 8. I joined Public Counsel in October 2009, taking a position as a Staff Attorney assisting low-income clients with housing, public benefits, and consumer finance issues. I moved to the Consumer Rights and Economic Justice Project in May 2011 and I became a Senior Staff Attorney in 2015.
- 9. I currently oversee the provision of direct consumer and bankruptcy legal services to over 1,000 clients each year in matters that include debt collection, bankruptcy, student loans, auto financing, foreclosure prevention, and access to credit, among other issues. My team also provides impact litigation assistance on matters relating to predatory lending and unfair business practices.
- 10. I am a member of the National Association of Consumer Advocates and I have become a leading advocate on consumer policy issues in California. I convene the Southern California Advocates for Consumer Justice Group, which fosters collaboration among its legal service provider members and provides consumer law training. I also have led consumer trainings at the national level, including for the Practicing Law Institute. I recently completed a term as a member of the Consumer Financial Protection Bureau's Consumer Advisory Board.
- 11. I have litigated individual and class consumer matters in state and federal court in California since 2011. My civil litigation practice has encompassed predatory lending, wrongful

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1	foreclosure, quiet title, elder abuse, procedural due process, criminal justice debt, and anti-trust		
2	cases. In 2017, I was named class counsel in Nozzi v. Housing Authority of the City of Los Angele		
3	2:07-cv-00380-PA-FFM (C.D. Cal.), a case that was litigated for over a decade and which settled		
4	and was certified as a class action. In addition, I was named as class counsel in Westlake Services		
5	LLC vs. Yeforzon Onoa, Los Angeles Superior Court BC714108, which settled and was certified as		
6	a class action.		
7	OTHER PUBLIC COUNSEL EXPERIENCE		
8	12. Public Counsel is one of the largest pro bono law firms in the United States.		
9	Founded in 1970, it currently has 158 total staff, with 85 attorneys. Lawyers at the firm handle		
10	direct services as well as impact litigation, including class actions and complex civil rights		
11	matters.		
12	13. In addition to the above-noted class action matters, Public Counsel also has been		
13	counsel of record in the following class actions, among others: Cruz v. State of California, Case		
14	No. RG 14727139 (certified for settlement); Franco v. Holder, CV 10-2211-DMG (C.D.		
15	Cal.); Reed v. State of California, Case No. BC432420; F.L.B (formerly J.E.F.M.) et al v.		
16	Lynch et al, 14-CV091926-TSZ (W.D. Wash.); Casey A. v. Gundry, CV-10-00192 (C.D. Cal.)		
17	(certified for settlement); and Community Action League v. Lancaster, et al., CV 11-4817 ODW		
18	(VBKx) (C.D. Cal.) (certified for settlement).		
19			
20	I declare under penalty of perjury under the laws of the United States of America and the		
21	State of California that the foregoing is true and correct.		
22			
23	Executed the 18th day of December 2023 at Los Angeles, California.		
24			
25	P/an		
26	J. 170C		
27	Stephanie Carroll		

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1 **PROOF OF SERVICE** 2 I am a citizen of the United States and employed in Los Angeles County, California. I 3 am over the age of eighteen years and not a party to the within-entitled action. My business 4 address is Hogan Lovells US LLP, 1999 Avenue of the Stars, Suite 1400, Los Angeles, 5 California 90067. On December 18, 2023, I served a copy of the within document(s): DECLARATION OF STEPHANIE CARROLL IN SUPPORT OF MOTION FOR 6 PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT 7 by transmitting via electronic transmission through Case Anywhere the 8 X document(s) listed above to the person(s) at the e-mail address(es) set forth below. by placing the document(s) listed above in a sealed envelope with postage thereon 9 fully prepaid, the United States mail at Los Angeles, California addressed as set forth below. 10 by placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal 11 Express agent for delivery. by transmitting via e-mail or electronic transmission the document(s) listed above 12 to the person(s) at the e-mail address(es) set forth below. 13 14 SEE ATTACHED SERVICE LIST 15 I am readily familiar with the firm's practice of collection and processing 16 correspondence for mailing. Under that practice it would be deposited with the U.S. Postal 17 Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation 18 19 date or postage meter date is more than one day after date of deposit for mailing in affidavit. 20 I declare under penalty of perjury under the laws of the State of California that the above is true and correct. 21 Executed on December 18, 2023, at Lancaster, California. 22 23 24 Tiffany de Jonge 25 26 27 28

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