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12 *Attorneys for Plaintiffs Lynn Slovin,*  
13 *Samuel Katz, Jeffery Price, and*  
14 *Justin Birkhofer, on their own*  
15 *behalf, and on behalf of all others*  
16 *similarly situated*

16 **IN THE UNITED STATES DISTRICT COURT**  
17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

18 LYNN SLOVIN, an individual, on her own  
19 behalf and on behalf of all others similarly  
20 situated,

21 Plaintiff,

22 v.

23 SUNRUN, INC., a California corporation,  
24 CLEAN ENERGY EXPERTS, LLC, a  
25 California limited liability company doing  
26 business as SOLAR AMERICA, and  
27 DOES 1-5, inclusive,

28 Defendants.

**Case No. 4:15-cv-05340-YGR**

**DECLARATION OF JEFFERY PRICE**

Hon. Yvonne Gonzalez Rogers

**DECLARATION OF JEFFERY PRICE**

I, Jeffery Price, states and declares as follows:

1. I am over the age of 18 years. I am a named plaintiff in this lawsuit.

2. I have personal knowledge of the facts stated in this declaration, and if called as a witness, could and would testify competently to the truth of the facts as stated herein.

3. I am a 70-year-old retired California State Park Ranger. I was employed as a Park Ranger for 31 years as an employee with benefits and later after retirement worked 10 years as a contract employee.

4. In 2014, I began to receive harassing, autodialed solar telemarketing calls even though my telephone number is registered to the National Do Not Call Registry. The callers often said they were calling to sell me “Solar America” products. I wrote a letter to the president of Clean Energy Experts (CEE), one of the defendants in this case, about the calls and asked to be placed on the company’s do not call list. I also lodged complaints against the company with the Better Business Bureau and the Business Consumer Alliance. None of these actions resulted in any relief to me or other consumers who were receiving these solar calls.

5. The solar calls did not stop, and in 2016, they started to increase in volume and appeared to be from multiple companies with similar or related names, multiple different telephone numbers, and multiple different callers. The callers were trying to sell me solar panels for my home. On one of the calls, the caller was trying to sell me Sunrun’s products.

6. Given the many different names and callers used, it was very difficult for me to determine what entity specifically was responsible for each call. I would try to use the phone number that I was given to call the party back and found that they were fake phone numbers. I also conducted internet research. Aside from learning that there were other people who complained about receiving unwanted solar calls from the same numbers that called me, I didn’t make any progress at all. Because this became far too complex for me to deal with on my own, I hired this team of lawyers with the resources and expertise to track down the responsible parties and to get the calls to stop.

1           7.       During the litigation, I spent a lot of time communicating with my lawyers about  
2 what was happening in the lawsuit and about what was being discovered. During the course of  
3 this case, I responded to over one hundred forty requests for production of documents, as well as  
4 many interrogatories and requests for admissions. I made multiple searches for records  
5 throughout my office files and even in boxes of old records stored in my attic. This process was  
6 quite time-consuming but necessary in order to assure a complete list of files were produced.

7           8.       I traveled by car from my home in Oxnard, California to San Diego, California to  
8 have my deposition taken. My deposition took from 9:28 AM until 6:06 PM. The required  
9 preparation, travel to and from the location, and almost 9 hours for the deposition consumed  
10 about 5 days of my personal time.

11          9.       In addition to the time to prepare and respond to my attorneys and the defendants,  
12 the Court should be aware of the significant amount of time and extraordinary effort involved on  
13 my part in documenting and keeping years of detailed records of each and every unsolicited and  
14 annoying telemarketing call, including photographs of each individual caller identification screen  
15 and scanned commercial telephone logs and records. I ardently believe that my meticulous and  
16 detailed recordkeeping significantly assisted and added to the ability of my attorneys to  
17 investigate, question, and ultimately settle the case for the entire class.

18          10.      Along with the other named plaintiffs in the case I was offered a substantial  
19 amount of money (\$100,000.00) to settle this case on an individual basis. An offer of  
20 \$100,000.00 would have made a significant difference for my life and my family's life. As a  
21 retired park ranger, it would have made my life significantly easier. I needed to give a lot of  
22 thought to the offer and the consequences of turning down the offer of judgment. Ultimately, I  
23 decided to turn down the offer because I felt it was my duty to represent the many other people  
24 who had been similarly harmed by illegal and abusive telemarketing scams.

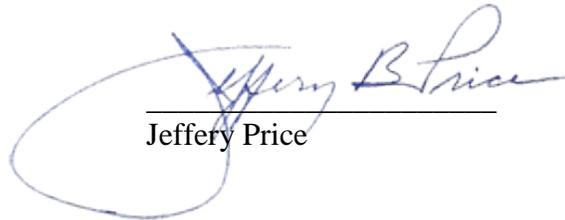
25          11.      I believe the settlement accomplishes the goals of the litigation, namely monetary  
26 relief to the class and important injunctive relief which should bring more transparency and  
27 oversight to the telemarketing practices of Sunrun and Clean Energy Experts (CEE). Among the  
28 practices, Sunrun and CEE agreed to merge their Do Not Call lists and therefore consumers

1 won't get telemarketing calls from both companies if they request to be placed on the Do Not Call  
2 list of either of those companies. The settlement also requires that Defendants' contracts with  
3 telemarketing vendors contain provisions that require the vendors to register the fictitious  
4 business names they use on calls. This should also make it easier for consumers to identify who  
5 is calling them. Sunrun and CEE are also required to conduct audits of their vendors which will  
6 allow Sunrun and CEE to make sure that their vendors are complying with the contracts.

7 12. Based on the above, I respectfully request that the Court grant me the requested  
8 service award.

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

11 Dated this 3rd day of April 2019 at Oxnard, California

12  
13  
14  A handwritten signature in blue ink, appearing to read "Jeffery B. Price", is written over a horizontal line. A large, loopy blue scribble is present to the left of the signature.  
15 Jeffery Price  
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