

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

FILED

NOV 01 2021  
COURT OF THE STATE OF WASHINGTON  
SPOKANE COUNTY CLERK

2021 NOV -1 P 4:42

TRENDY W. FITZGERALD  
SPOKANE COUNTY CLERK

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF SPOKANE**

JAKE MILLER and DOREEN MILLER, )  
husband and wife, on behalf of themselves and )  
all others similarly situated, )

Case No.: 20-2-02604-32

Plaintiffs, )

**DECLARATION OF KIRK D. MILLER  
IN SUPPORT OF UNOPPOSED MOTION  
FOR AWARD OF ATTORNEYS' FEES,  
COSTS, AND SERVICE AWARDS**

vs. )

GUENTHER MANAGEMENT, LLC, a )  
Washington limited liability company, )

Defendant. )

Kirk D. Miller declares the following under penalty of perjury, as provided for and by the laws of the state of Washington:

1. I am one of the attorneys representing the Plaintiffs in this matter.
2. This Declaration is based on my personal knowledge.
3. I am a member in good standing admitted to practice by the bars of the following

courts:

COPY

1 Washington State Bar  
2 Admitted: May 19, 2008

United States District Court  
Eastern District of Washington  
Spokane, Washington  
Admitted: June 24, 2008

4  
5 United States Court of Appeals  
6 for the 9<sup>th</sup> Circuit  
7 San Francisco, California  
8 Admitted: January 24, 2014

United States District Court  
Western District of Washington  
Admitted: April 1, 2013

9 United States Court of Appeals  
10 for the 6<sup>th</sup> Circuit  
11 Cincinnati, Ohio  
12 Admitted: April 9, 2015

13 4. I graduated from the Gonzaga School of Law, Spokane, Washington in 2007.

14 5. From 2008 to present, I am the principal with the firm Kirk D. Miller, P.S. in  
15 Spokane, Washington.

16 6. Since 2008, I have actively litigated cases in Washington state and federal courts,  
17 with most of my practice involving litigation of consumer rights and consumer finance cases,  
18 primarily under the Washington Consumer Protection Act, Fair Debt Collection Practices Act,  
19 debt collection defense, and Fair Credit Reporting Act claims, debt collection defense, and  
20 claims arising under the Washington Residential Landlord-Tenant statute.

21 7. The vast majority of my practice involves representing low-income clients against  
22 businesses and corporations such as the Plaintiffs in this case.

23 8. I am experienced in complex litigation, including consumer class action cases,  
24 prosecuted under various consumer protection statutes.

25 9. I have lectured to attorneys in the following legal education seminars including  
but not limited to the following:

1	Gonzaga University Law School/ Spokane County Bar Association	CLE for Northwest Justice Project and other legal services sponsored by NCLC
2	<i>Training for Debt Defense CLE</i>	<i>FDCPA &amp; Collection Defense</i>
3	"Defendant Debt Collection Lawsuits/	"Defendant Debt Collection Lawsuits/
4	Assignment of Debt and Business Records	Assignment of Debt and Business Records
5	Exception to Hearsay"	Exception to Hearsay" September 14-15,
6	February 18, 2011 Spokane, Washington	2010 Seattle, Washington
7	Fairchild Air Force Base JAG training	CLE to NCLC Consumer Rights Debt
8	<i>Training for JAG officers on Consumer</i>	Collection Defense Intensive Conference
9	<i>Law Issues</i>	Participants
10	<i>"Debt Collection Defense"</i>	<i>"Defense perspectives on Plaintiff's</i>
11	October 21, 2011	<i>Litigation Trends in Debt Collection</i>
12	Fairchild AFB, Washington	<i>Defense"</i>
13		October 6, 2011 Chicago, Illinois
14	CLE for the Yakima County Bar	CLE for Benton/Franklin County Bar
15	Association	Association and Legal Aid Society
16	<i>"Debt Collection Defense"</i>	<i>"Debt Collection Defense"</i>
17	October 2012 Yakima, WA	March 22, 2013 Richland, WA
18	Washington Consumer Law Task Force –	Northwest Consumer Law Center – 1st
19	Annual Gathering and CLE <i>"Defenses to</i>	Annual Consumer Law Intensive Cle
20	<i>Debt Buyer Lawsuits"</i>	"FDCPA and Debt Collection Defense"
21	September 12, 2014	March 10, 2016 Seattle, WA
22	Seattle, WA	
23	2015 Access to Justice Conference	Featured presenter at the upcoming:
24	Issues in Washington Debt Buyer	Northwest Consumer Law Center – 2nd
25	Litigation	Annual Consumer Law Intensive Cle
26	June 13, 2015 Wenatchee, WA	"Recovering Costs and Attorney's Fees
27		Defending Debt Collection Cases"
28		March 7, 2017 Seattle, WA
29	Northwest Justice Project	Washington Association for Justice
30	Garnishment 1.0 and 2.0; Everything	Consumer Protection CLE
31	You've Ever Wanted to Know About	Presenting on the FDCPA chapter
32	Garnishment	October 11, 2017
33	March 20, 2017 Seattle, WA	
34	Yakima Bar Association CLE	National Consumer Law Center
35	Debt Defense and Attorney Fees	Consumer Rights Litigation Conference
36	Yakima, WA	Post-Judgment Consumer Actions
37	November 10, 2017	Las Vegas, NV
38		November 2018

1 Spokane County Bar Association  
2 Consumer Law CLE  
3 Spokane, WA  
4 November 2019

5 10. I am co-author of the Washington Association for Justice Consumer Rights  
6 Deskbook FDCPA and Usury sections.

7 11. I have held an active role in establishing and maintaining the Spokane Volunteer  
8 Lawyers Consumer Advocacy Program (CAP) and donate many pro-bono hours each year to  
9 representing low-income individuals in Spokane County Superior and District Courts.

10 12. Prior to the COVID-19 court shutdowns, I volunteered most Fridays with the  
11 Spokane County Bar Association Volunteer Lawyers Consumer Assistance Program, assisting  
12 and/or representing low-income individuals who appear in court with consumer issues.

13 13. I have attended many local and national Continuing Legal Education seminars on  
14 the topic of consumer rights, FDCPA, and debt collection defense, including but not limited to:  
15 National Consumer Law Center (NCLC) trainings in Washington, D.C. (2007, 2013, 2018);  
16 Chicago, IL; Seattle, WA; Philadelphia, PA, San Antonio, TX, Jacksonville, FL, Tampa, FL,  
17 Anaheim, CA, and New Orleans, LA (2017), Las Vegas, NV (2018), Boston, MA (2019).

18 14. I am a multi-year recipient of the Spokane County Bar Association Consumer  
19 Advocate of the Year Award.

20 15. I have been an active member of the National Association of Consumer  
21 Advocates (NACA) for more than 10 years.

22 16. I have served continuously since 2014 as the Washington State Chair for the  
23 National Association of Consumer Advocates (NACA).

24 17. I have served as a member of the Spokane County Bar Association Volunteer  
25 Lawyers Program Advisory Committee.

1           18.     I previously served a six-year uncompensated term on the board of directors for  
2 Family Promise Spokane, a non-profit organization that serves homeless families in the Spokane  
3 community.

4           19.     I am an AVVO 10-rated attorney.

5           20.     I was named one of Spokane's top 100 attorneys from 2016 – present in Spokane  
6 and Coeur d'Alene Living Magazine, in the categories of Bankruptcy and Debt, and Litigation.  
7

8           21.     I previously served on the Washington State Bar Association Rules Committee, as  
9 chairperson for the Evidence rules sub-committee.

10          22.     I run a for-profit law firm but because my clients are typically low-income, it is  
11 my practice to regularly accept a small or no retainer from my clients. Most of my living is  
12 earned on a contingent-fee basis under statutory fee-shifting provisions.  
13

14          23.     A reasonable hourly rate for my class action contingent fee cases is \$525.00 per  
15 hour. Because my firm has limited staff and my firm is one of the only area consumer rights-  
16 focused firms, allocation of resources to this case prevented certain funds and personnel efforts  
17 from being directed to the prosecution of others.

18          24.     I am aware of aware of another attorney who litigates in this district and charges  
19 his corporate client a non-contingent fee rate of \$745.00 per hour to defend a class action. See  
20 USDC Case No. 2:19-cv-00390 TOR, ECF No. 21.  
21

22          25.     I prosecuted the claims at issue efficiently and effectively, making every effort to  
23 prevent duplication of work and delegating tasks to co-counsel and non-attorney staff whenever  
24 possible.

25          26.     All the fees requested by my firm were reasonably incurred and entirely  
contingent upon a successful outcome.

1           27. I have previously litigated multiple class actions where I received no payment for  
2 an extraordinary amount of time spent. I have also voluntarily previously reduced my attorney's  
3 fees in order to facilitate class settlements.

4           28. I own one of the only dedicated consumer-rights focused law firms in the state of  
5 Washington that is willing to take on consumer cases such as the one at bar.

6           29. Attached hereto as **Exhibit A** is a true and correct copy of my firm's billing  
7 records prepared using our Time and Billing™ software. The records were made at or near the  
8 time of the event by a person with knowledge of the event (namely, Kirk D. Miller, co-counsel,  
9 or office staff). My firm normally bills Paralegal support staff at \$150.00 per hour and \$90.00  
10 per hour for legal assistant time. I have investigated and am familiar with rates charged for  
11 paralegals and legal assistants in this region and my firm's rate is at, or below the market rate for  
12 such services.  
13

14           30. Attached as **Exhibit B** is a true and correct copy of the costs my firm incurred in  
15 representing this action, which are subsumed in Class Counsel's \$50,000 fee request.  
16

17           31. I anticipate that I will spend approximately 10 – 20 additional hours on this case  
18 between November 1, 2021 and the end of May, 2022, when I expect the settlement  
19 administration to complete and the Court will enter final orders terminating the litigation.  
20

21           32. As there is a dearth of relevant state case law on class actions settlements,  
22 attached hereto as **Exhibit C** (only in the Judge's Copy) is some of the authority from the federal  
23 courts heavily cited in Plaintiff's Motion.

24           SIGNED at Spokane, WA, this 15<sup>th</sup> day of November, 2021.

25  
  
KIRK D. MILLER, WSBA #40025

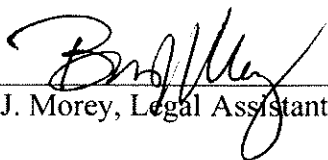
1 **CERTIFICATE OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the state of Washington that on  
3 the date stated below I served a copy of this document in the manner indicated:

4 Jeffrey P. Downer  
5 Carinne E. Bannan  
6 LEE SMART, P.S. INC.  
7 1800 One Convention Place  
8 701 Pike Street  
9 Seattle WA 98101

- First Class U.S. Mail
- E-Mail
- Hand Delivery
- Next Day Air

10 DATED this  7  day of November, 2021.

11   
12 \_\_\_\_\_  
13 Bonnie J. Morey, Legal Assistant

# **EXHIBIT A**

## **Time and Billing Records**

*Declaration of Kirk D. Miller  
in Support of Plaintiff's Motion for  
Award of Attorney's Fees, Costs,  
And Service Award*

Jake Miller et al. v. Guenther Management, LLC  
Spokane County Superior Court Case No. 20-2-02604-32



Bill to:  
**Doreen Miller**

**Miller, Doreen v. Guenther 0849**  
Payment due on receipt.

**INVOICE**

To November 01, 2021

Invoice Date            November 01, 2021  
Invoice Number        61  
Due Date                Due Upon Receipt

<b>Account Summary</b>	
Previous Balance	\$0.00
Payments Received	\$0.00
Outstanding Balance	\$0.00
Current Invoice	\$47,112.50
<b>Total Due</b>	<b>\$47,112.50</b>

## Fee Detail

Date		Description	Hours	Rate	Total
4/16/2020	KDM	Case review w/SJS	0.40	\$525.00/hr	\$210.00
4/16/2020	SJS	Meeting: With CLs conc. LLT issues and representation	1.10	\$450.00/hr	\$495.00
4/17/2020	KDM	review/sign retainer agreements	0.30	\$525.00/hr	\$157.50
4/17/2020	SJS	Drft: Representation agreements; Comm: with CLs conc representation	0.60	\$450.00/hr	\$270.00
4/29/2020	SJS	Drft: Complaint for Damages	3.90	\$450.00/hr	\$1,755.00
5/11/2020	SJS	Drft: First set of Rogs and RFPs	4.10	\$450.00/hr	\$1,845.00
5/12/2020	KDM	Review/edit complaint and first set of discovery. Brief conference w/SJS re same.	2.10	\$525.00/hr	\$1,102.50
5/12/2020	SJS	Drft: Finalize Discovery sets	2.20	\$450.00/hr	\$990.00
5/28/2020	KG	Documentation	0.30	\$150.00/hr	\$45.00
6/18/2020	KDM	Brief conference w/ Teri Bracken re Service of process.	0.10	\$525.00/hr	\$52.50
6/18/2020	TB	Review file; Check status of SOP upon Defendant	0.40	\$150.00/hr	\$60.00
7/13/2020	KG	Case Review	0.10	\$150.00/hr	\$15.00
7/17/2020	TB	Process NOA for Defendant	0.40	\$150.00/hr	\$60.00
7/21/2020	KDM	Brief conference re case statute w/ Shayne Sutherland .	0.20	\$525.00/hr	\$105.00
7/21/2020	SJS	Rvw: Downer LTR Disc case with Kirk Miller	0.40	\$450.00/hr	\$180.00
8/3/2020	KDM	Review discovery responses received from OC.	1.00	\$525.00/hr	\$525.00
8/3/2020	SJS	Rvw: Defendant's Answers to Discovery	0.90	\$450.00/hr	\$405.00
8/3/2020	TB	Review Defs discovery responses	1.00	\$150.00/hr	\$150.00
8/20/2020	KDM	Review defendant's answer to complaint.	0.30	\$525.00/hr	\$157.50
8/20/2020	SJS	Rvw: Defendant's Answer	0.40	\$450.00/hr	\$180.00
8/21/2020	TB	Email to clients Re Discovery Answers	0.40	\$150.00/hr	\$60.00
9/14/2020	SJS	Drft: Answers to Rogs and RFPs	4.60	\$450.00/hr	\$2,070.00

Date		Description	Hours	Rate	Total
9/15/2020	KDM	Review/edit responses/objections to Defendant's discovery requests.	1.50	\$525.00/hr	\$787.50
9/15/2020	TB	Finalize Plaintiffs Answers to Defs First Rogs & RFPs	2.00	\$150.00/hr	\$300.00
9/16/2020	SJS	Drft: Final edits to discovery answers	0.60	\$450.00/hr	\$270.00
9/16/2020	TB	Finalize Answers to Interrogatories & RFPs	2.50	\$150.00/hr	\$375.00
10/1/2020	TB	Drft: LTR to Cls conc. discovery responses	0.50	\$150.00/hr	\$75.00
12/28/2020	SJS	Rvw: Def.s answers to discovery for 26(i) (0.8)	0.80	\$450.00/hr	\$360.00
1/4/2021	SJS	Rvw: Discovery; Drft: Email to OC conc. discovery at issue for 26 (i) 1.1	1.10	\$450.00/hr	\$495.00
1/6/2021	KDM	draft/edit JSR	0.50	\$525.00/hr	\$262.50
1/6/2021	SJS	Lit: Prep for Discovery conference (1.1); Disc. Conference with OC (0.5)	1.60	\$450.00/hr	\$720.00
1/6/2021	TB	Meeting w/Attorney; Finalize JSR; Email to Judge/Court	0.40	\$150.00/hr	\$60.00
1/7/2021	TB	Finalize JSR; Email to Court	0.20	\$150.00/hr	\$30.00
2/3/2021	KG	Calendaring	1.00	\$125.00/hr	\$125.00
2/8/2021	KDM	conference with Shayne Sutherland re counter-offer.	0.40	\$525.00/hr	\$210.00
2/8/2021	SJS	Conf: With Kirk Miller conc. counteroffer	0.40	\$450.00/hr	\$180.00
2/8/2021	SJS	PC to Cls conc. settlement	0.30	\$450.00/hr	\$135.00
2/11/2021	KDM	review/edit draft settlement letter.	0.20	\$525.00/hr	\$105.00
2/11/2021	SJS	Comm: PC to CL (0.2)	0.20	\$450.00/hr	\$90.00
2/11/2021	SJS	Drft: ER 408 offer to settle (0.3); Comm: PC to OC (0.1)	0.40	\$450.00/hr	\$180.00
3/8/2021	KDM	conference w/SJS re class administration.	0.50	\$525.00/hr	\$262.50
3/8/2021	SJS	Rvw: Class admin estimate (0.2); Comm: email and PC to OC conc. settlement	0.30	\$450.00/hr	\$135.00
3/8/2021	SJS	Comm: Email and PC with OC; Comm with JND class action administration firm	0.40	\$450.00/hr	\$180.00

Date		Description	Hours	Rate	Total
3/15/2021	SJS	Rvw: Estimates on class admin (0.3); Conf: With CC disc. settlement and class admin (0.3); Comm: PC and email to OC (0.4)	1.00	\$450.00/hr	\$450.00
3/18/2021	KDM	conference w/ Shayne Sutherland re settlement offer and calculating counter.	0.80	\$525.00/hr	\$420.00
3/18/2021	SJS	Rvw: Counteroffer from OC Conf: with Kirk Miller conc. offer	0.70	\$450.00/hr	\$315.00
3/18/2021	SJS	Conf: with Kirk Miller re calculating counteroffer	0.30	\$450.00/hr	\$135.00
3/29/2021	KDM	review email X2 re extension of offer.	0.10	\$525.00/hr	\$52.50
3/29/2021	SJS	Comm: PCs with CL and OC conc. class settlement (0.6); email to OC with offer (0.2)	0.80	\$450.00/hr	\$360.00
4/8/2021	KDM	conference w/ Shayne Sutherland re accepted settlement and next steps.	0.30	\$525.00/hr	\$157.50
4/12/2021	KDM	review/edit settlement offer.	0.20	\$525.00/hr	\$105.00
4/12/2021	SJS	Rvw: Settlement agreement (0.3); Drft: Edits to settlement agreement (0.3); Conf: with CC conc. agreement (0.1)	0.70	\$450.00/hr	\$315.00
4/15/2021	KDM	Review/edit CR 2a settlement and release agreement.	0.60	\$525.00/hr	\$315.00
4/15/2021	SJS	Rvw: Final Settlement agreement draft; Comm: email to OC	0.40	\$450.00/hr	\$180.00
4/26/2021	SJS	Comm: PC and Email to CLs conc. settlement agreement	0.30	\$450.00/hr	\$135.00
5/19/2021	KDM	conference with Shayne Sutherland and Teri Bracken re getting client signatures on settlement.	0.20	\$525.00/hr	\$105.00
6/21/2021	SJS	Drft: Pleadings and settlement agreement re class certification and preliminary approval (8.1); Comm: With CA conc. class admin (0.1)	8.20	\$450.00/hr	\$3,690.00
6/22/2021	SJS	Drft: Pleadings for preliminary approval (7.8)	7.80	\$450.00/hr	\$3,510.00
6/23/2021	SJS	Edits to pleadings	6.10	\$450.00/hr	\$2,745.00
6/23/2021	TB	Review and edit Proposed Orders Re Class Settlementq	1.20	\$150.00/hr	\$180.00

Date		Description	Hours	Rate	Total
6/24/2021	KDM	review/edit/draft class action settlement pleadings and attachments. Discussion w/ Shayne Sutherland re same.	2.30	\$525.00/hr	\$1,207.50
6/24/2021	SJS	Drft: Edits to Pleadings (3.4); Comm: PC and email with OC concerning docs (0.4)	3.80	\$450.00/hr	\$1,710.00
6/25/2021	SJS	Comm: Rvw emails of class administrator	0.10	\$450.00/hr	\$45.00
6/29/2021	SJS	Comm: With Class admin	0.20	\$450.00/hr	\$90.00
6/30/2021	SJS	Comm: email to Class Admin	0.10	\$450.00/hr	\$45.00
7/22/2021	KDM	email and brief discussion w/SJS re California-specific language in proposed final order.	0.30	\$525.00/hr	\$157.50
7/22/2021	SJS	Rvw: Edits of Oc and incorporate into new docs (3.5); Comm: PC to OC (0.1)	3.60	\$450.00/hr	\$1,620.00
7/23/2021	SJS	Comm: with OC conc. case; email to OC with Docs; Rvw: Final Docs	0.90	\$450.00/hr	\$405.00
7/28/2021	SJS	Rvw: Comm: from OC (0.1); Drft: edits to pleadings (0.2); Comm: email to OC conc changes (0.1)	0.40	\$450.00/hr	\$180.00
7/28/2021	SJS	Comm: email to class administrator conc. road forward and updated notices	0.30	\$450.00/hr	\$135.00
8/11/2021	KDM	rvw emails and brief discussion w/SJS re class member data.	0.30	\$525.00/hr	\$157.50
8/11/2021	SJS	Comm: Email to OC	0.10	\$450.00/hr	\$45.00
8/23/2021	SJS	Conf: with CAdmin conc. tenant info; With Staff concerning timing of motion and hearing	0.30	\$450.00/hr	\$135.00
9/8/2021	SJS	Comm: PC to OC conc. tenant information	0.10	\$450.00/hr	\$45.00
9/9/2021	KDM	brief conference w/ Teri Bracken and Shayne Sutherland re setting preliminary approval motion for consideration.	0.20	\$525.00/hr	\$105.00
9/10/2021	SJS	Rvw: Settlement paperwork; Comm: PC to OC conc. settlement	0.40	\$450.00/hr	\$180.00
9/16/2021	SJS	Drft: Final edits and corrections to pre-approval docs (0.8)	0.80	\$450.00/hr	\$360.00

Date		Description	Hours	Rate	Total
10/4/2021	SJS	Rvw: order of preliminary approval (0.2); Drft: motion to amend (0.4); Comm: email and tc with OC conc. motion (0.2)	0.80	\$450.00/hr	\$360.00
10/5/2021	SJS	Comm: With class administrator concerning approval and steps going forward (0.2)	0.20	\$450.00/hr	\$90.00
10/18/2021	SJS	Rvw: Comms info from OC; Comm: with class administrator	0.20	\$450.00/hr	\$90.00
10/19/2021	KDM	review email chain with Shayne Sutherland and class admin re notification logistics.	0.30	\$525.00/hr	\$157.50
10/19/2021	SJS	Comm: with class administrator regarding notice and timelines	0.20	\$450.00/hr	\$90.00
10/25/2021	SJS	Rvw: Pleadings and settlement (0.5)	0.50	\$450.00/hr	\$225.00
10/26/2021	SJS	Rsch: Case law attorneys fees (3.4); Drft: Memo in support of fees (4.2)	7.60	\$450.00/hr	\$3,420.00
10/27/2021	SJS	Drft: Memo in support of fees (5.1)	5.10	\$450.00/hr	\$2,295.00
10/27/2021	SJS	Rvw: final notices	0.20	\$450.00/hr	\$90.00
10/28/2021	SJS	Rvw Final email notice from Class Admin and Comm with Class admin	0.20	\$450.00/hr	\$90.00
10/28/2021	SJS	Drft: Edits to memo, prep declarations in support and review time records	6.40	\$450.00/hr	\$2,880.00
10/29/2021	SJS	Rvw: comms between OC and class administrator	0.10	\$450.00/hr	\$45.00
11/1/2021	KDM	review pleadings - fee memo and exhibits. Decl of Kirk Miller	2.40	\$525.00/hr	\$1,260.00
			<b>Hours Total</b>	<b>109.10</b>	
				<b>Fee Total</b>	<b>\$47,112.50</b>

**Expense Detail**

Date	Description	Quantity	Rate	Total
<i>No expenses have been charged for this invoice.</i>				
			<b>Expenses Total</b>	<b>\$0.00</b>

Fees	\$47,112.50
Expense	\$0.00
<b>Current Due</b>	<b>\$47,112.50</b>
Outstanding Balance	\$0.00
<b>Total Due</b>	<b>\$47,112.50</b>

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Hours</b>
Katie Grace	1.40
Kirk Miller	15.50
Shayne J Sutherland	83.20
Teri Bracken	9.00
<b>Total Hours</b>	<b>109.10</b>

**Miller, Doreen v. Guenther 0849**  
**Doreen Miller**

<b>Due Date</b>	<b>Due Upon Receipt</b>
<b>Invoice #</b>	<b>61</b>
<b>Total Due</b>	<b>\$47,112.50</b>
<b>Amount Paid</b>	\$ <input type="text"/>

Make payment to:

**KIRK D MILLER PS**  
421 W Riverside Ave  
Suite 660  
Spokane, WA 99201

---



# **EXHIBIT B**

## **Costs Record**

*Declaration of Kirk D. Miller  
in Support of Plaintiff's Motion for  
Award of Attorney's Fees, Costs,  
And Service Award*

Jake Miller et al. v. Guenther Management, LLC  
Spokane County Superior Court Case No. 20-2-02604-32

**Kirk D. Miller, P.S.**  
421 W. RIVERSIDE AVE., STE. 660  
SPOKANE, WA 99201

---

Jake and Doreen Miller v. Guenther Management, LLC  
SCSC Cause No. 20-2-02604-32

**CASE EXPENSES**

<b>DATE</b>	<b>DESCRIPTION</b>	<b>RATE</b>	<b>TOTAL</b>
06/23/2020	Service of Process Fee		100.00
09/22/2020	Spokane County Superior Court Filing Fee		240.00
Throughout case	Photocopies and Scans (Over 1,200)	.35 per page	420.00
	<b>Total Reimbursement Requested</b>		<b>\$760.00</b>

# EXHIBIT C

**Out of Washington State Authority Substantially Relied Upon (Judge's Copy  
Only)**

*Declaration of Kirk D. Miller  
in Support of Plaintiff's Motion for  
Award of Attorney's Fees, Costs,  
And Service Award*

Jake Miller et al. v. Guenther Management, LLC  
Spokane County Superior Court Case No. 20-2-02604-32