

Hank Bates (SBN 167688)
Edwin L. Lowther
CARNEY BATES & PULLIAM, PLLC
519 W. 7th Street
Little Rock, AR 72201
T: (501) 312-8500
F: (501) 312-8505
hbates@cbplaw.com
llowther@cbplaw.com

James Lawrence Kauffman
jkauffman@baileyglasser.com
BAILEY GLASSER, LLP
1055 Thomas Jefferson St, NW Suite 540
Washington, DC 20007
T: (202) 463-2101

Gillian L. Wade
Sara D. Avila
Marc A. Castaneda
MILSTEIN JACKSON FAIRCHILD &
WADE, LLP
10250 Constellation Blvd., 14th Floor
Los Angeles, CA 90067
T: (310) 396-9600
F: (310) 396-9635
gwade@mjfwlaw.com
savila@mjfwlaw.com
mcastaneda@mjfwlaw.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JENNIFER M. LANGSTON, on
behalf of herself and all others
similarly situated,

Plaintiff,

v.

GATEWAY FIRST BANK, itself and
as successor by merger to GATEWAY
MORTGAGE GROUP, LLC,

Defendant.

Case No.: 5:20-cv-01902-VAP-KK

**DECLARATION OF JENNIFER
LANGSTON**

Date: August 29, 2022

Time: 2:00 p.m.

Place: Courtroom 8A

1 I, Jennifer Langston, declare as follows:

2 1. I am over 21 years of age. I make this declaration based on my own personal
3 knowledge. If called upon to testify, I could and would testify competently to the truth of
4 the matters stated herein.

5 2. Since hiring Carney Bates & Pulliam, PLLC and Bailey & Glasser LLP in
6 May 2020, I have kept in regular communication with my attorneys, particularly Lee
7 Lowther, and actively participated in the litigation and resolution of this action.

8 3. More specifically, since May 2020, I have performed the following tasks:
9 (1) initial factual investigation, including creating a spreadsheet cataloging every instance
10 in which Defendant had collected a Pay-to-Pay fee dating back to April 2017; (2)
11 researching Defendant's websites accessible only to those with Gateway login credentials
12 for the purpose of finding fee schedules and every representation available online that
13 Defendant made to its borrowers concerning Pay-to-Pay fees; (3) reviewing and providing
14 commentary to counsel on drafts of the Complaint; (4) reviewing all pleadings relating to
15 Defendant's motion to dismiss; (5) working with counsel to review and respond to
16 discovery, including gathering documents responsive to requests for production; (6)
17 keeping in regular contact with counsel concerning case developments and discovery; (7)
18 participating in the mediation process and considering various settlement offers and
19 counteroffers with counsel; and (8) reviewing and discussing the terms of the settlement
20 reached in this case.

21 4. I estimate I spent between 20 and 25 hours performing those tasks.

22 I declare under penalty of perjury that the foregoing is true and correct.

23
24 Executed this 18th day of July 2022 in Barstow, California.

25
26
27 *Jennifer Langston*

Jennifer Langston (Jul 18, 2022 11:14 PDT)

JENNIFER LANGSTON







22.07.18 Declaration of Jennifer Langston.FINAL

Final Audit Report

2022-07-18

Created:	2022-07-18
By:	Kim Draheim (kdraheim@cbplaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAALU1TAQesiZmWN_F7GSWnoC8SCYKMy8J

"22.07.18 Declaration of Jennifer Langston.FINAL" History

-  Document created by Kim Draheim (kdraheim@cbplaw.com)
2022-07-18 - 5:39:42 PM GMT- IP address: 20.127.14.14
-  Document emailed to Cherry Langston (jlangston@tmo.com) for signature
2022-07-18 - 5:40:11 PM GMT
-  Email viewed by Cherry Langston (jlangston@tmo.com)
2022-07-18 - 6:13:12 PM GMT- IP address: 74.125.209.54
-  Signer Cherry Langston changed full name at signing to Jennifer Langston
2022-07-18 - 6:14:17 PM GMT- IP address: 47.180.26.3
-  Document e-signed by Jennifer Langston (jlangston@tmo.com)
Signature Date: 2022-07-18 - 6:14:19 PM GMT - Time Source: server- IP address: 47.180.26.3
-  Agreement completed.
2022-07-18 - 6:14:19 PM GMT