

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

FRANCIS WOODROW, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

SAGENT AUTO, LLC D/B/A SAGENT
LENDING TECHNOLOGIES,

Defendant.

Case No.: 2:18-cv-1054

Judge J.P. Stadtmueller

Magistrate Judge William E. Duffin

**DECLARATION OF STEFAN COLEMAN IN SUPPORT OF PLAINTIFF FRANCIS
WOODROW’S MOTION FOR FEES, COSTS, AND INCENTIVE AWARD**

I, Stefan Coleman, declare as follows:

1. I am co-lead counsel representing Plaintiff Francis Woodrow as well as the Class Members in this case.
2. I respectfully submit this declaration in support of the Motion for Fees, Costs, and Incentive Award.
3. I am a partner of the Law Offices of Stefan Coleman, P.A., a boutique litigation firm focused on complex litigation matters, including specifically class action cases brought under the Telephone Consumer Protection Act, 47 U.S.C. § 227 (“TCPA”). Included herein is my firm’s resume.
4. I have been licensed to practice law in the State of Florida since 2006 and have been a member in good standing of the Florida Bar since my admission.

5. I am also admitted to practice law in New York and New Jersey, as well as several other district courts throughout the country.

6. I have litigated dozens of TCPA matters during my career including a number of significant nationwide settlements listed in my firm's resume.

7. I have been involved in the instant case from an extensive pre-suit investigation through to the settlement and presentment of this motion.

8. My firm undertook this case on a contingency-fee basis which required us to risk spending time on this case without any assurance of monetary gain. This matter required me to spend time on this litigation that could have been spent on other fee-generating matters.

9. Based on my experience in having litigated dozens of TCPA matters and in settling significant nationwide class settlements, I believe that the settlement reached in this case is a good result for the class.

I declare under penalty of perjury that the facts stated herein are true and correct.

May 26, 2019

/s/ Stefan Coleman
Stefan Coleman

The Law Firm Resume

The Law Offices of Stefan Coleman, P.A. is a dynamic law firm that concentrates its practice on consumer law and technology. The core of the law firm is based on an in-depth knowledge of an ever-evolving technology and its impact on the law. Specifically, the firm has devoted much of its practice to protecting consumer's privacy rights as well as protecting consumers from product defects and false advertisements. The firm also works on behalf of companies to alert them to the most recent changes and evolutions in the law as it applies to their industry as well as litigating class action cases. The firm has participated in a number of significant class actions on behalf of consumers.

Stefan Coleman, Esq. is a graduate of the University of Virginia and the University of Miami School of Law. He has practiced law for over twelve years in which time he has participated in a number of significant class actions on behalf of consumers. The following is a brief list of some of the class actions that he has participated in.

Pimental v. Google Inc., a Telephone Consumer Protection Act case that resulted in a \$6 million settlement for consumers who received a text message from Google's Slide app.

Woodman v. ADP Dealer Services, Inc., et al., a Telephone Consumer Protection Act case that resulted in a \$7.5 million settlement for consumers who received unsolicited text messages promoting car sales.

Lanza v. Palm Beach Holdings., et al., a Telephone Consumer Protection Act case that resulted in a \$6.5 million settlement for consumers who received unsolicited text messages.

Kolinek v Walgreen, Co. a Telephone Consumer Protection Act case that resulted in an \$11 million settlement for consumers who received unsolicited calls to their cell phone.

Hopwood v. Nuance Communications., et al., a Telephone Consumer Protection Act case that resulted in a \$9.24 million settlement for consumers who received unsolicited calls.

Kran v. Hearst a Telephone Consumer Protection Act case that resulted in a \$2.1 million settlement for consumers who received unsolicited calls.

Schlossberg v. Gannett Co., Inc. a Telephone Consumer Protection Act case that resulted in a \$13.4 million settlement for consumers who received unsolicited calls.

Mendez v. Price Self Storage, a Telephone Consumer Protection Act case that resulted in a \$450,000 settlement for consumers who received unwanted text messages.

Newby v. Rita's Water Ice Franchise., a Telephone Consumer Protection Act case that resulted in a \$3 million settlement for consumers who received unsolicited text messages.

Flanigan v. The Warranty Group, Inc. and American Protection Plans LLC d/b/a American Residential Warranty., a Telephone Consumer Protection Act case that resulted in a \$16 million settlement for consumers who received unsolicited calls.

Martin v. Global Marketing Research Services, a Telephone Consumer Protection Act case that resulted in a \$10 million fund for consumers who received unsolicited calls.

Stone & Co. v. LKQ Corporation, a Telephone Consumer Protection Act case that resulted in a \$3.26 million fund for consumers who received a fax from the defendant.

Horn and Vetter v. iCan Benefit Group, LLC, a Telephone Consumer Protection Act case that resulted in a \$60 million judgment against the Defendant.

Dobkin v. NRG, a Telephone Consumer Protection Act case that resulted in a \$7 million fund for consumers who received an unwanted calls from the defendant.

Gergetz v. Telenav, a Telephone Consumer Protection Act case that resulted in a \$3.5 million fund for consumers who received a text message from the Defendant.

Bowman v. Art Van Furniture, a Telephone Consumer Protection Act case that has been preliminarily approved, resulting in a \$5.87 million fund for consumers who received unwanted phone calls from the Defendant.