

1 Michael F. Ram, CSB #104805
2 Email: mram@forthepeople.com
3 MORGAN & MORGAN
4 101 Montgomery Street, Suite 1800
San Francisco, California 94104
Telephone: (415) 358-6913

5 Beth E. Terrell, CSB #178181
6 Email: bterrell@terrellmarshall.com
7 Jennifer Rust Murray, *Admitted Pro Hac Vice*
8 Email: jmurray@terrellmarshall.com
9 TERRELL MARSHALL LAW GROUP PLLC
10 936 North 34th Street, Suite 300
Seattle, Washington 98103
Telephone: (206) 816-6603

11 [Additional counsel appear on signature page]

12 *Attorneys for Plaintiffs*

13 UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

15 DANIEL BERMAN, STEPHANIE
16 HERNANDEZ, and ERICA RUSSELL,

17 Plaintiffs,

18 v.

19 FREEDOM FINANCIAL NETWORK, LLC,
20 FREEDOM DEBT RELIEF, LLC, FLUENT,
INC., and LEAD SCIENCE, LLC,

21 Defendants.

Case No. 4:18-cv-01060-YGR

**DECLARATION OF ERICA
RUSSELL IN SUPPORT OF
SETTLEMENT**

JURY TRIAL DEMAND

Honorable Yvonne Gonzalez Rogers

DATE:
TIME:
LOCATION:

22 I, Erica Russell, declare as follows:

23 1. I am an adult over 18 years of age. I make the following declaration based on my
24 personal knowledge. I am able to competently testify on the facts in this declaration.
25

1 2. I have personal knowledge of the facts described in this declaration. I could and
2 would testify to them if called up on to do so.

3 3. I live in Ponca City, Oklahoma.

4 4. I have a cell phone. My cell phone's telephone number begins (918) 914.

5 5. Sometime in late 2017 or early 2018 I visited a website that was offering a \$1,000
6 Walmart gift card. To get the reward I was required to type my telephone number onto an
7 electronic form on the website. I did not know that by typing my number on the form I would
8 receive telemarketing calls from Freedom Debt relief. I thought I needed to provide my number
9 so that I could get the gift card.

10 6. After I entered my telephone number onto the form I started receiving numerous
11 robocalls. I told the callers to stop calling, but the calls kept coming. They were so frequent that I
12 decided to change my telephone number.

13 7. Between February 7 and 14 2018, I received three prerecorded voice calls and
14 five text messages selling Freedom's debt settlement products. I never consented to receive those
15 calls.

16 8. Throughout this lawsuit, I have worked with my lawyers by answering their
17 questions and responding to Defendants' written questions. When they asked, I provided nearly
18 two hundred pages of documents, which I understand have been given to the Defendants in this
19 case. I also worked with my lawyers to obtain additional records from my cellular service
20 providers through third-party subpoenas.

21 9. I spent several hours during the pandemic with my lawyers preparing for my
22 deposition. The deposition took place on June 29, 2020, which was right at the beginning of the
23 Covid 19 pandemic. The deposition took place in a conference room where I was by myself. I
24 am a single mom, and I had to line up childcare to attend the deposition. The court reporter and
25 all the lawyers attended by video. The deposition lasted from approximately 10:40 a.m. to
26 around 2:20 p.m.

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10. I worked with my attorneys to draft multiple declarations that I understand my attorneys submitted to the court when Defendants asked the court to force me to arbitrate my case.

11. I talked to my lawyer about the settlement multiple times. It was important to me that the settlement provided money for the other people who received robocalls from Defendants. I support the settlement and believe it is an excellent result.

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

EXECUTED in Ponca city, Oklahoma, this 16 day of March, 2023.

DocuSigned by:


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Erica Russell