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Attorneys for Plaintiff and others similarly situated

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CINNAMON MILLS, individually, on
a representative basis, and on behalf of
all others similarly situated;

Plaintiff,

vs.

TARGET CORPORATION, a
Minnesota Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: 5:20-CV-01460-JGB-KK
[Assigned to Hon. Jesus G. Bernal]

FRCP RULE 23 CLASS ACTION

**DECLARATION OF DEEPAK
GUPTA, ESQ., IN SUPPORT OF
MOTION FOR FINAL APPROVAL**

1 I, Deepak Gupta, declare as follows:

2 1. I am a member of the Bar of the District of Columbia, a founding principal of
3 Gupta Wessler, LLP, and an attorney for the plaintiff, Cinnamon Mills, on behalf of
4 herself and all others similarly situated. I am submitting this declaration in support of the
5 motion for final approval and for attorneys' fees.

6 **QUALIFICATIONS OF COUNSEL**

7 2. I graduated from Georgetown University Law Center in 2002 and have been a
8 member in good standing of the District of Columbia bar since 2005. I was admitted *pro*
9 *hac vice* in this case.

10 3. I am the founding principal of Gupta Wessler LLP, a litigation boutique with
11 experience bringing complex cases on behalf of employees, consumers, and other plaintiffs
12 and focus on representing plaintiffs in Supreme Court and appellate litigation. I am a
13 Lecturer on Law at Harvard Law School, where I teach the Harvard Supreme Court
14 Litigation Clinic and regularly teach courses on the American civil-justice system. I am also
15 an elected member of the American Law Institute and a public member of the
16 Administrative Conference of the United States. Over more than two decades, I have led
17 high-stakes litigation before the U.S. Supreme Court, all thirteen federal circuits, and
18 numerous state and federal courts nationwide and have often served as class counsel or co-
19 counsel for the plaintiffs in certified class actions. I have also testified before the U.S.
20 Senate, the U.S. House of Representatives, and the Presidential Commission on the
21 Supreme Court. Much of my advocacy has focused on ensuring access to justice for
22 workers, consumers, and communities injured by corporate or governmental wrongdoing.

23 4. My colleague Neil K. Sawhney played a key role in all aspects of this litigation,
24 including arguing the appeal in this case before the U.S. Court of Appeals for the Ninth
25 Circuit. Mr. Sawhney graduated from Stanford Law School in 2014 and has been a
26 member in good standing of the Bar of the State of California since 2014. Mr. Sawhney
27 clerked for Justice Goodwin Liu of the California Supreme Court and Judge Marsha
28 Berzon of the United States Court of Appeals for the Ninth Circuit.

1 5. At all times relevant here, Mr. Sawhney was an associate at Gupta Wessler
2 LLP, where he represented consumers, workers, and public-interest organizations in
3 appellate and complex litigation. He served in that role until October 2023, when he
4 became the first Director of Appellate Advocacy for the ACLU of Northern California. At
5 Gupta Wessler, Mr. Sawhney successfully argued multiple appeals on behalf of plaintiffs in
6 federal and state court and was named a 2021 Rising Star by the National Consumer Law
7 Center. Previously, he was a senior staff attorney at the Southern Poverty Law Center's
8 Economic Justice Project.

9 **HOURS INCURRED, HOURLY RATE, AND COSTS INCURRED**

10 6. The information in this declaration regarding the time spent on the case by
11 Gupta Wessler LLP attorneys is based on contemporaneous daily time records regularly
12 prepared and maintained by the firm. I reviewed these time records in connection with the
13 preparation of this declaration. The purpose of this review was to confirm both the accuracy
14 of the time entries as well as the necessity for, and reasonableness of, the time and expenses
15 committed to the litigation.

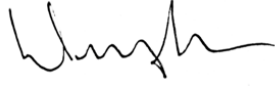
16 7. Mr. Sawhney spent 194 hours working on this action. Although his normal
17 billing rate is \$1,000 per hour, and this rate is the same as attorneys with similar experience
18 at our firm, we are only asking for a discounted rate of \$777 in this action, consistent with
19 co-counsel's fee request. I have spent 102.50 hours working on this action. Although my
20 normal billing rate is \$1,250 per hour, and this rate is usual for practitioners with my level of
21 expertise and experience, I am only asking for a discounted rate of \$1,057 in this action,
22 consistent with co-counsel's fee request.

23 8. The above totals include our firm's work on the briefing and argument in this
24 Court as well as our work in the U.S. Court of Appeals for the Ninth Circuit, in which we
25 took the lead on the interlocutory appeal.

26 9. Gupta Wessler LLP incurred a total of \$1,329.90 in costs in this litigation,
27 including airfare associated with the Ninth Circuit oral argument and printing costs.

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

1 Executed on March 22, 2024, at Washington, DC.

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3 By: 
4 Deepak Gupta, Esq.
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