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*Attorneys for Plaintiffs Sheri Dodge, Neil Dodge,  
Ram Agrawal, Sarita Agrawal and All Others  
Similarly Situated*

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

SHERI DODGE and NEIL DODGE,  
and RAM AGRAWAL and SARITA  
AGRAWAL, individually and on  
behalf of all others similarly situated,

Plaintiffs,  
v.

PHH CORPORATION, a Maryland  
corporation; REALOGY HOLDINGS  
CORP., a Delaware corporation; PHH  
HOME LOANS LLC, a Delaware  
limited liability company; PHH  
MORTGAGE CORPORATION, a  
New Jersey corporation; RMR  
FINANCIAL, LLC, a California  
limited liability company; NE MOVES  
MORTGAGE LLC, a Massachusetts  
limited liability company; PHH  
BROKER PARTNER  
CORPORATION, a Maryland  
corporation; REALOGY GROUP  
LLC, a Delaware limited liability

Case No. 8:15-CV-01973-FMO-AFM

**DECLARATION OF RAM AGRAWAL  
IN SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT,  
CERTIFICATION OF SETTLEMENT  
CLASS, AND APPROVAL OF CLASS  
NOTICE**

Date: September 14, 2017  
Time: 10:00 a.m.

Judge: Hon. Fernando M. Olguin  
Ctmm: 6D, 6th Floor – 1st Street

DECLARATION OF RAM AGRAWAL IN SUPPORT OF PRELIMINARY APPROVAL

No. 8:15-cv-01973-FMO-AFM

1 company; REALOGY  
2 INTERMEDIATE HOLDINGS LLC,  
3 a Delaware limited liability company;  
4 TITLE RESOURCE GROUP LLC, a  
5 Delaware limited liability company;  
6 WEST COAST ESCROW  
7 COMPANY, a California corporation;  
8 TRG SERVICES ESCROW, INC., a  
9 Delaware corporation; EQUITY  
10 TITLE COMPANY, a California  
11 corporation; NRT LLC, a Delaware  
12 limited liability company; REALOGY  
13 SERVICES GROUP LLC, a Delaware  
14 limited liability company; REALOGY  
15 SERVICES VENTURE PARTNER  
16 LLC, a Delaware limited liability  
17 company,

18 Defendants.

19 I, Ram Agrawl, declare as follows:

20 1. I submit this declaration in support of preliminary approval of the  
21 Stipulation of Settlement agreed upon by myself, Sheri Dodge, Neil Dodge, and  
22 Sarita Agrawal, as Plaintiffs, and Defendants PHH Corporation, PHH Broker Partner  
23 Corp., PHH Mortgage Corp., Realogy Intermediate Holdings LLC, Realogy  
24 Holdings Corp., Realogy Group LLC, Realogy Services Venture Partner LLC,  
25 Realogy Services Group LLC, Title Resource Group LLC, West Coast Escrow  
26 Company, TRG Services Escrow, Inc., Equity Title Company, NRT LLC, PHH  
27 Home Loans, LLC, RMR Financial Corp., and NE Moves Mortgage LLC in this  
28 Action. I have personal knowledge of the facts of this case and the proposed  
Settlement, and if called as a witness to testify to them, I could and would do so  
competently.

2. I am a competent adult over the age of eighteen years of age and a  
resident of California.

3. I am one of the named plaintiffs in the above-entitled action.



1           4.     On or about March 31, 2015, my wife, Sarita Agrawal, and I refinanced  
2 our mortgage home loan for a home located at 28016 Ridgebrook Court in Rancho  
3 Palos Verdes, California, with Morgan Stanley Private Bank, N.A. PHH acted as  
4 Morgan Stanley Private Bank, N.A.'s agent and provided services for Morgan  
5 Stanley Private Bank, N.A. in processing and underwriting the loan.

6           5.     My wife and I were referred to TRG for both title insurance (via TRG  
7 subsidiary Equity Title) and other settlement services (via TRG subsidiary TRG  
8 Services) in connection with the refinance. We trusted and relied that the referrals  
9 were lawful and not part of an anticompetitive kickback scheme.

10          6.     My wife and I paid fees and other charges totaling approximately  
11 \$1,233.50 to Equity Title and TRG Services for title insurance and other settlement  
12 services, respectively, in conjunction with the settlement of the mortgage loan.

13          7.     After closing, our new loan was serviced by PHH.

14          8.     My wife and I were never notified by Defendants in connection with this  
15 transaction that PHH had been contractually obligated to refer clients to Equity Title  
16 and TRG Services for title and other settlement services, and to cause Morgan Stanley  
17 Private Bank, N.A. to refer all title insurance and settlement services to TRG. At the  
18 time of this transaction, my wife and I were not aware of these arrangements. My wife  
19 and I were also never notified and not aware of the true nature of the business  
20 arrangements and affiliations involving PHH, Equity Title, and TRG Services.

21          9.     I contacted one of plaintiffs' counsel regarding this transaction. After  
22 several discussions and additional investigation, I retained plaintiffs' counsel to  
23 represent me in this case. These firms were retained to prosecute my claims as a class  
24 action, and I agreed to act as a representative plaintiff. I understand that as a class  
25 representative, I have a duty to put the Class' interests ahead of my own individual  
26 interests and to act in the best interests of the Class.

27          10.    My interests are aligned with those of the Class. Throughout my  
28 involvement in the case, I have sought to maximize the benefits recovered by the

1 Class relating to the claims that Defendants violated the Real Estate Settlement  
2 Procedures Act. I know of no interests that are antagonistic with or in conflict with  
3 the interests of the Class.

4 11. Prior to the filing of the Fourth Amended Complaint on July 31, 2017,  
5 which I reviewed before it was filed, I met with, spoke with, and emailed my attorneys  
6 many times to understand the claims that were being alleged in this Action since it  
7 was originally filed in November 2015. I have also reviewed documents at my  
8 attorneys' request, and searched for documents and information at my attorneys'  
9 request. I have communicated frequently with my attorneys to discuss my refinance  
10 transaction, the status of discovery and discovery disputes, the defenses asserted by  
11 the Defendants, the status of settlement negotiations, and the interrogatories and  
12 deposition notices sent by me and the other representative plaintiffs, which I reviewed  
13 before they were sent to Defendants, to confirm documents and facts needed to  
14 administer the Settlement.

15 12. I reviewed the Settlement and believe that the benefits provided by the  
16 Settlement represent an excellent result for the putative Class. I am pleased that the  
17 Settlement provides significant monetary compensation to Class Members that is  
18 proportionate to the amounts paid by each Class Member for title-, escrow-, or  
19 closing-related charges.

20 13. I spent substantial time and effort pursuing this Action and the interests  
21 of the putative Class. While I have not maintained contemporaneous time records of  
22 my activities in connection with this litigation, my best estimate is that I have spent  
23 at least 30 hours working on and participating in this litigation and serving as a class  
24 representative and I remain continuously on call to work with my attorneys in this  
25 matter.

26 14. I understand that under the Settlement, my attorneys will request that the  
27 Court award each Class Representative, including myself, an incentive award of  
28 \$2,500. I have been informed and understand that whether I receive an incentive

1 award and, if so, in what amount, is entirely up to the Court. I also understand that  
2 the requested incentive awards are to be considered by the Court separately from  
3 whether the Settlement is fair, reasonable, and adequate, and that if the Court declines  
4 the requested incentive awards, or awards a different amount, that determination will  
5 not affect the validity or finality of the Settlement. My support of the Settlement is  
6 not conditioned on an incentive award and I recommend the Settlement based on my  
7 belief that it is fair, reasonable, and in the best interest of the putative Class.

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

9 Executed this 24th day of August 2017, at Rancho Palos Verdes, California.

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13 RAM AGRAWAL  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 25, 2017, I caused to be filed the foregoing DECLARATION OF RAM AGRAWAL IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, AND APPROVAL OF CLASS NOTICE. This document is being filed electronically using the Court's electronic case filing (ECF) system, which will automatically send a notice of electronic filing to the email addresses of all counsel of record.

Dated: August 25, 2017

/s/ Daniel S. Robinson  
Daniel S. Robinson