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**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

VERONICA DORADO, individually and on
behalf of a class of similarly situated persons,

Plaintiff,

vs.

BANK OF AMERICA, N.A.,

Defendant.

CIVIL ACTION
NO. 1:16-cv-21147-UU

CLASS ACTION
JURY TRIAL DEMANDED

DECLARATION OF KEVIN EPPS

1. My name is Kevin Epps. I am an attorney admitted to practice in the State of Georgia and the United States District Court for the Northern District of Georgia. I am a partner with the law firm of Epps Holloway DeLoach & Hoipkemier, LLC (“EHDH” or “the Firm”).

2. Along with co-counsel from Bondurant Mixson & Elmore, LLP, EHDH was appointed as Class Counsel in the Court’s order dated December 15, 2016 preliminarily approving the Settlement Agreement in this case (the “Preliminary Approval Order”). [Dkt. 113.]

3. This Declaration is submitted in support of the Application for Service Award for Class Representative.

4. Class Counsel respectfully requests a service award of \$10,000.00 for Plaintiff Veronica Dorado in recognition of her service on behalf of the Class and the result achieved in the litigation.

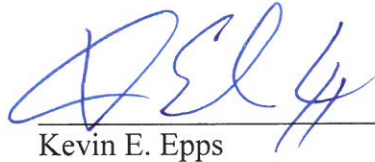
5. The Court appointed Plaintiff Veronica Dorado as representative for the Class in the Preliminary Approval Order. [Dkt. 113.]

6. Both the short form notice and the long form (detailed) notice approved by the Court in the Preliminary Approval Order apprise Class Members that Class Counsel would request a service award of up to \$10,500.00 for Ms. Dorado. No objections have been received by Class Counsel to the requested service award or to the Settlement from the more than 500,000 Class Members to whom notice was mailed.

7. Ms. Dorado provided Class Counsel with documents and information relating to her mortgage loan with Bank of America, monitored the litigation through communication with counsel, searched for and produced documents in response to Bank of America's document requests, spent hours assisting counsel in answering interrogatories, reviewed pleadings, prepared for her deposition, and participated in settlement negotiations. Ms. Dorado works full-time, frequently taking shifts on nights and weekends, and made herself available for telephone calls or to sign or review documents late at night and on short notice at the request of Class Counsel.

8. Ms. Dorado's services over the course of the litigation have benefitted the Class. Ms. Dorado stepped forward to represent the Class and has well served the Class as representative.

This declaration is made within the United States and pursuant to Title 28 of the United States Code, Section 1746. I declare under penalty of perjury that the foregoing is true and correct. I have executed this declaration on January 20, 2017.


Kevin E. Epps