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12 13	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA	
14	CENTRAL DISTRIC	CT OF CALIFORNIA
15	BENNION & DEVILLE FINE	Case No. 5:15-CV-01921 R (KKx)
16	HOMES, INC., a California corporation, BENNION & DEVILLE FINE HOMES SOCAL, INC., a	Hon. Manual L. Real
17 18	California corporation, WINDERMERE SERVICES SOUTHERN CALIFORNIA, INC., a California	DECLARATION OF JEFFREY A. FEASBY RE: COURT'S
19	corporation,	JUNE 8, 2016 ORDER
20	Plaintiffs,	Courtroom: 8
21	V.	
22	WINDERMERE REAL ESTATE SERVICES COMPANY, a Washington	
23	SERVICES COMPANY, a Washington corporation; and DOES 1-10	
24	Defendant.	
25	AND RELATED COUNTERCLAIMS	Complaint Filed: September 17, 2015
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I, Jeffrey A. Feasby, hereby declare,

- 1. I am an attorney for Defendant and Counterclaimant Windermere Real Estate Services Company ("WSC") in this matter. I am licensed to practice law in all state and federal courts in the State of California. I am the attorney at Pérez Wilson Vaughn & Feasby who was primarily responsible for preparing WSC's discovery responses, working with WSC's employees to locate and collect potentially responsive documents, reviewing those documents, and producing those that were responsive. I have personal, firsthand knowledge of the facts set forth below, and if called as a witness, I could and would competently testify to the information set forth herein.
- 2. On June 8, 2016, I received the Court's Order Granting in Part and Denying in Part Plaintiffs' Motion to Compel. The efforts undertaken to comply with plaintiffs' discovery requests are set forth in my prior declaration and the declarations of Paul Drayna and Josh Christenson filed with the Court on May 6, 2016 along with the parties' Joint Stipulation to Plaintiffs' Motion to Compel Production of Documents and Responses (Docket No. 42).
- 3. In addition to those efforts, and after reviewing the Court's order, I went back through all of plaintiffs' interrogatories, WSC's responses, the parties' meet and confer correspondence and my notes regarding same, and WSC's supplemental interrogatory responses. Upon reviewing these materials, I determined that WSC had fully complied with its discovery obligations with regard to its responses to plaintiffs' interrogatories.
- 4. With regard to plaintiffs' requests for production, I went back through plaintiffs' requests, WSC's responses, the parties' meet and confer correspondence and my notes regarding same, and WSC's supplemental responses in order to determine which categories of documents WSC had agreed to produce. I then went back through the hard copy files I had received from the client as well as the documents the client had uploaded to the VPN site, which included the emails that

resulted from the search terms that I had provided to Mr. Christenson, and additional documents that had been emailed to me by various WSC employees who had searched out additional responsive documents at my requests or at the request of WSC's General Counsel, Paul Drayna. I had organized all of these documents and files as responsive, non-responsive, and/or privileged. I then cross-referenced the responsive documents with the documents that WSC had produced to plaintiffs.

- 5. In reviewing these materials, it occurred to me that there may be additional documents that would be responsive to plaintiffs' requests in the possession of another law firm that had represented both plaintiff Windermere Services Southern California, Inc. and WSC in prior litigation against a WSC franchisee in San Diego. As a result, my office contacted this firm and requested copies of the firm's documents related to that matter. It was represented to me that an attorney for this firm contacted plaintiffs' counsel in this case and inquired whether they also wanted copies of these files, which they did. As a result, I have been told that one set of this firm's files for the prior litigation will be sent to my office, and a duplicate set will be sent to plaintiffs' counsel's office.
- 6. Based on my review of all of these discovery materials, and with the production of the files from the parties' attorneys in the prior proceeding, I believe that WSC has complied with its discovery obligations with regard to its responses to plaintiffs' requests for production and its production of documents in response to those requests.

I declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct, executed this 1st day of July, 2016, at San Diego, California.

/s/ Jeffrey A. Feasby Jeffrey A. Feasby