

# **EXHIBIT 3**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

JUANITA WILLIAMS, on behalf of  
herself and others similarly situated,

Case No. 1:23-cv-00292-RAH-KFP

CLASS ACTION

Plaintiff,

v.

CHOICE HEALTH INSURANCE  
LLC,

Defendant.

**DECLARATION OF ANTHONY I. PARONICH IN SUPPORT OF CLASS  
COUNSEL'S MOTION FOR CLASS COUNSEL FEES AND EXPENSES**

I, Anthony I. Paronich, declare under penalty of perjury as follows:

1. I make this declaration in support of Class Counsel's Motion for Class Counsel Fees and Expenses. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

2. Class Counsel zealously represented Plaintiff and the Settlement Class Members' interests throughout the litigation and will continue to do so.

3. I devoted significant time and resources to investigating the claims against Defendant, researching and developing the legal claims at issue, preparing for and attending mediation, negotiating and drafting the Settlement Agreement,

drafting the preliminary approval documents, and attending to all actions required thereafter pursuant to the Preliminary Approval Order.

4. My firm's expenses are \$14,298.00. These costs include filing fees, service of process fees, expert fees, data processing fees, travel expenses, and mediation fees.

5. I have extensive experience and expertise prosecuting complex class actions and am particularly experienced in the litigation, certification, and settlement of nationwide TCPA class action cases.

6. I am an attorney duly admitted to practice in the Commonwealth of Massachusetts, I am over 18 years of age, and I am competent to testify and make this declaration on personal knowledge. I have extensive experience in the prosecution of class actions on behalf of consumers, particularly claims under the TCPA.

7. I am a 2010 graduate of Suffolk Law School. In 2010, I was admitted to the Bar in Massachusetts. Since then, I have been admitted to practice before the Federal District Court for the District of Massachusetts, the Northern District of Illinois, the Eastern District of Michigan, the Western District of Wisconsin, the Southern District of Indiana, the First Circuit Court of Appeals, the Seventh Circuit Court of Appeals, and the Ninth Circuit Court of Appeals. From

time to time, I have appeared in other State and Federal District Courts *pro hac vice*. I am in good standing in every court to which I am admitted to practice.

8. I was an associate at Broderick Law, P.C. in Boston, Massachusetts from 2010 through 2016.

9. I was a partner at Broderick & Paronich, P.C. in Boston, Massachusetts from 2016 through 2019.

10. In 2019, I started Paronich Law, P.C., focused on protecting consumers in class action lawsuits.

11. I have been appointed class counsel in more than 45 TCPA cases, including the following:

- i. Desai and Charvat v. ADT Security Services, Inc., USDC, N.D. Ill., 11-CV-1925, a TCPA class settlement of \$15,000,000 granted final approval on June 21, 2013.
- ii. Jay Clogg Realty Group, Inc. v. Burger King Corporation, USDC, D. Md., 13-cv-00662, a TCPA class settlement of \$8,500,000 granted final approval on April 15, 2015.
- iii. Charvat v. AEP Energy, Inc., USDC, N.D. Ill., 1:14-cv-03121, a TCPA class settlement of \$6,000,000 granted final approval on September 28, 2015.
- iv. Bull v. US Coachways, Inc., USDC, N.D. Ill., 1:14-cv-05789, a TCPA class settlement finally approved on November 11, 2016 with an agreement for judgment in the amount of \$49,932,375 and an assignment of rights against defendant's insurance carrier.
- v. Smith v. State Farm Mut. Auto. Ins. Co., et. al., USDC, N.D. Ill., 1:13-cv-02018, a TCPA class settlement of \$7,000,000.00 granted final approval on December 8, 2016.

- vi. Mey v. Frontier Communications Corporation, USDC, D. Conn., 3:13-cv-1191-MPS, a TCPA class settlement of \$11,000,000 granted final approval on June 2, 2017.
- vii. Heidarpour v. Central Payment Co., USDC, M.D. Ga., 15-cv-139, a TCPA class settlement of \$6,500,000 granted final approval on May 4, 2017.
- viii. Abante Rooter and Plumbing, Inc. v. Birch Communications, Inc., USDC, N.D. Ga., 1:15-CV-03562-AT, a TCPA class settlement of \$12,000,000 granted final approval on December 14, 2017.
- ix. Abante Rooter and Plumbing, Inc. v. Pivotal Payments, Inc., USDC, N.D. Ca., 3:16-cv-05486-JCS, a TCPA class settlement of \$9,000,000 granted final approval on October 15, 2018.
- x. In re Monitronics International, Inc., USDC, N.D.W. Va., 1:13-md-02493-JPB-JES, a TCPA class settlement of \$28,000,000 granted final approval on June 12, 2018.
- xi. Thomas Krakauer v. Dish Network, L.L.C., USDC, M.D.N.C., 1:14-CV-333 on September 9, 2015. Following a contested class certification motion, this case went to trial in January of 2017 returning a verdict of \$20,446,400. On May 22, 2017, this amount was trebled by the Court after finding that Dish Network's violations were "willful or knowing", for a revised damages award of \$61,339,200. (Dkt. No. 338). The Fourth Circuit Court of Appeals unanimously affirmed the judgment in May of 2019. *Krakauer v. Dish Network, L.L.C.*, 925 F.3d 643 (4th Cir. 2019). The United States Supreme Court rejected *certiorari* of this matter in December of 2019. See *DISH Network L.L.C. v. Krakauer*, 140 S. Ct. 676 (2019).
- xii. Abante Rooter and Plumbing, Inc. v. Alarm.com Incorporated, et. al., USDC, ND. CA., 4:15-cv-06314-YGR, a TCPA class settlement of \$28,000,000 granted final approval on August 13, 2019.
- xiii. Charvat v. Carnival Corporation & PLC, et. al., USDC, ND. Ill., 1:13-cv-00042, a TCPA class settlement of \$12,500,000 granted final approval in April of 2020.
- xiv. Loftus v. Sunrun, Inc., USDC, N.D. Ca., 3:19-cv-1608, a TCPA class settlement of \$5,500,000 granted final approval on May 11, 2021.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE UNDER PENALTY OF PERJURY OF THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED THIS 22<sup>nd</sup> DAY OF APRIL, 2024 IN THE COMMONWEALTH OF MASSACHUSETTS.

/s/ Anthony I. Paronich  
Anthony I. Paronich