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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

16 HEATHER STERN, on behalf of
17 herself and all others similarly situated,

18 Plaintiff,

19 v.

20 AT&T MOBILITY CORPORATION
21 f/k/a CINGULAR WIRELESS
22 CORPORATION, et al.,

23 Defendants.

24 PAUL LOZANO, on behalf of himself
25 and all others similarly situated,

26 Plaintiff,

27 v.

28 AT&T WIRELESS SERVICES, INC.,
et al.,

Defendants.

HEATHER STERN, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

NEW CINGULAR WIRELESS
SERVICES, INC. f/k/a AT&T
WIRELESS SERVICES, INC., et al.

CASE NO. CV 05-8842 CAS (CTx)

**DECLARATION OF CAROLINE B.
MAHONE-GONZALEZ IN SUPPORT
OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENTS
[REDACTED]**

CASE NO. CV 02-0090-CAS (AJWx)

CASE NO. SACV 09-1112-CAS (AGRx)

**CONSOLIDATED FOR
COORDINATED SETTLEMENT**

Case Nos. CV 05-8842; CV 02-0090; SACV 09-1112

DECLARATION OF CAROLINE B. MAHONE-GONZALEZ IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENTS

1 **DECLARATION OF CAROLINE B. MAHONE-GONZALEZ**

2 I, CAROLINE B. MAHONE-GONZALEZ, declare as follows:

3 1. I am employed by AT&T Mobility LLC (“ATTM”) as Area Manager
4 for the Office of the President, West Region. I was previously employed by AT&T
5 Wireless Services, Inc. (“AWS”) as a customer care representative, supervisor, and
6 area manager, until October 2004, when AWS merged out of existence and with
7 Cingular Wireless LLC (“Cingular”). Following that merger, I became familiar
8 with customer care data as maintained by Cingular. I have personal, firsthand
9 knowledge of the facts stated herein and, if called to testify, I could and would
10 competently testify to these facts.

11 2. I have reviewed or searched for AT&T Wireless Services, Inc.
12 (“AWS”) accounts of the following individuals using the information provided by
13 them as submitted on their objections to the class action settlements at issue in this
14 case: James E. Coffin, Sally Y. Coffin, Clark Richard Brown, Gene Hopkins,
15 Barbara Cochran, Karin Lynch, Robert Lynch, and Marc Gambello. The results of
16 my review of their account records or search for account records for each individual
17 is provided below:

18 3. James E. Coffin. I reviewed the account records for James E. Coffin.
19 He provided an address in Orcas, Washington and mobile telephone number **REDACTED**
20 **REDACTED**-0213. The records show that he had an AWS account from 2001 to 2005. His
21 records do not show any California addresses. His records also do not show any
22 payments for mMode Data Service (“mMode”) or ENH Discount International Dial
23 (“EDID”).

24 4. Sally Y. Coffin. I reviewed the account records for the mobile
25 telephone number provided by Sally Y. Coffin, **REDACTED**-0213. The mobile
26 telephone number she provided, which is the same number as provided by James E.
27
28

1 Coffin, is associated only with Mr. Coffin, and Ms. Coffin is not named on the
2 account.

3 5. Clark Richard Brown. The mobile telephone number provided by Mr.
4 Brown, REDACTED 03643, is a not a valid telephone number. I did a comprehensive
5 search for Clark Brown and Richard/Rich Brown in the 216 area code and found an
6 account under Rich and Mary Brown at REDACTED 3643 in Sagamore Hills, Ohio.
7 This account was opened on January 29, 2005 with Cingular, after AWS's merger
8 with Cingular, and is not an AWS account.

9 6. Gene Hopkins. I reviewed the account records of Gene Hopkins in
10 Brecksville, Ohio and mobile telephone number REDACTED 6053. This account was
11 activated on June 1, 2005 with Cingular, and was never active with AWS. I also
12 searched for Mr. Hopkins in AWS's records and identified a prior account with a
13 different phone number, which was activated with AWS on June 16, 1999 and was
14 migrated to Cingular on June 1, 2005. I reviewed his account records from 1999 to
15 2005. His records do not show any payments for EDID or mMode. His records do
16 not show any California addresses.

17 7. Barbara Cochran. I reviewed the account records of Barbara Cochran
18 in Port Hueneme, California and mobile telephone number REDACTED 1174. I traced
19 her account information to a prior account in a different market with a different
20 number. This earlier account was initially opened on February 15, 2005 with
21 Cingular, after AWS's merger with Cingular, and is not an AWS account.

22 8. Karin Lynch. I reviewed the account records of Karin and Robert
23 Lynch in Santa Barbara, California at mobile numbers REDACTED 0807, REDACTED
24 7440, REDACTED 1962, REDACTED 4800, and REDACTED 3778. The records show that
25 Karin Lynch had an AWS account at mobile number REDACTED 0807 and REDACTED
26 7440.

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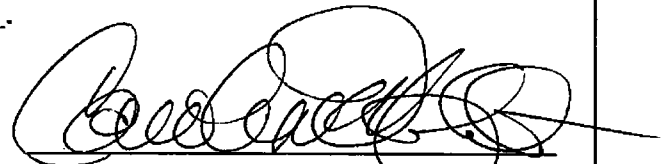
1 9. Robert Lynch. The records show that Mr. Lynch was not associated
2 with any AWS accounts.

3 10. Marc Gambello. I reviewed the account records of Marc Gambello at
4 Ft. Lauderdale, Florida and mobile numbers **REDACTED**-6777 and **REDACTED**-6083. I
5 was unable to locate an account associated with the phone number **REDACTED**-6083.
6 The records show that **REDACTED**-6777 was an AWS account associated with an
7 address in Hollywood, Florida. His records do not show any California addresses.
8 His records do not show any payments for mMode or EDID.

9 11. In reviewing the account information for these individuals, where the
10 phone number provided was an ATTM or Cingular telephone number, I searched
11 through multiple databases to determine whether the subscriber previously had an
12 AWS account that was migrated from AWS to Cingular and later to ATTM. I
13 estimate that searching through these databases to confirm the existence of an AWS
14 account took approximately one hour per subscriber.

15 12. Once the account was confirmed to be an AWS account, I reviewed
16 each billing record page by page to determine whether the subscriber had paid for
17 mMode or EDID, experienced any out-of-cycle billing, or ever had a California
18 address. I estimate that pulling the records for each subscriber and reviewing them
19 took approximately two to four hours per subscriber depending on the length of
20 service provided by AWS to the subscriber and thus the number pages in the
21 account records.

22
23 I declare under penalty of perjury under the laws of the United States of
24 America that the foregoing is true and correct. Executed on this 15th day of
25 October, 2010, at Sacramento, CA.

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Caroline B. Mahone-Gonzalez