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17 Attorneys for Plaintiffs KIRAN SHAH and HEMANGINI PATEL
18 and JOSEPH and PATRICIA MICHEL,
19 on behalf of themselves and all others similarly situated

20 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
21 **COUNTY OF ORANGE**

22 KIRAN SHAH and HEMANGINI PATEL;
23 ANTHONY GODFREY and NAOMI
24 GODFREY; VICTOR GUDZUNAS and
25 JULIE GUDZUNAS; EYNALD DUARTE
26 and MADELEINE DUARTE, on behalf of
27 themselves and all others similarly situated,

28 Plaintiffs,

vs.

PULTE HOME CORPORATION, a
Corporation; MUELLER INDUSTRIES,
INC., a Corporation, and DOES 1-100,

Defendants.

AND RELATED CROSS-CLAIMS.

CASE NO. 30-2014-00731604-CU-CD-CXC
Assigned for all purposes to:
Judge Peter Wilson
Dept. CX-101

**DECLARATION OF RICHARD
BRIDGFORD IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: March 2, 2023
Time: 2:00 p.m.
Dept.: CX-101

Complaint Filed: 06/30/2014

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DECLARATION OF RICHARD K. BRIDGFORD

I, Richard K. Bridgford, declare as follows:

1. I am an attorney at law duly licensed to practice before all of the courts of the State of California and am a principal at Bridgford, Gleason & Artinian, co-counsel of record for Plaintiffs in this action. I have personal knowledge of the proceedings in this matter, including those facts and circumstances stated herein. If called upon to do so, I could and would competently testify under oath as to those matters set forth in this Declaration.

EXPERIENCE OF COUNSEL

2. My firm originated the pending Ladera Ranch, Yorba Linda and Talega pinhole leak class litigation cases, which stemmed from prior multi-plaintiff complex construction defect litigation my firm was counsel on. Those prior multi-plaintiff complex cases included pinhole leak issues in Ladera Ranch. The cases were captioned *Flynn et al. v. Standard Pacific, et al.* – Orange County Superior Court Case No.: 30-2010-00371011; and *Rubin et al. v. Standard Pacific, et al.* – Orange County Superior Court Case No.: 30-2011-00471183.

3. At the outset of the instant pinhole leak class action cases, my firm sought to associate with other experienced class action counsel. We ultimately chose to jointly prosecute these pinhole class cases with the law firms of Kabateck, LLP and McNicholas & McNicholas LLP.

4. I also have prior experience litigating copper pipe leak cases. In addition to the above-referenced multi-plaintiff cases my firm handled that involved pinhole leak issues (Michael Artinian and I jointly litigated those cases), I also litigated copper leak construction defect cases representing a defendant developer (Ahmanson Developments, Inc.) in the late 1990's and early 2000's.

5. My firm is also co-counsel on the related pinhole cases before this Court – including three cases which this Court finally approved class settlements (*Bremen v. William Lyon, Constabileo vs. MBK Homes*, and *Wang v. Woodbridge*).

1 6. Examples of the numerous construction defect cases my firm has handled over the
2 years are:

- 3 a. *Farshchian v. Ahmanson Developments, Inc.*, LASC/Central, BC205655 (1999)
4 b. *Torrance-Windemere HOA v. Ahmanson Developments*, LASC/Southwest,
5 YC017528 (1993)
6 c. *Agagas v. Ahmanson Developments*, SBSC/Rancho Cuc., RCV054011 (2001)
7 d. *Claffey v. Ahmanson Developments*, SBSC/Rancho Cuc., RCV052360 (2001)
8 e. *Plunkett v. Ahmanson Developments*, OCSC/Central, 01CC02572 (2001)
9 f. *Garcia v. Ahmanson Developments*, Alameda/Oakland, H208572-0 (1999)
10 g. *Riddle v. Forecast Homes, Inc.*, LASC/Central, BC224332 (2001)
11 h. *New Summer Place v. Rockfield Development*, SBSC, SCV36843 (1997)
12 i. *Bloom v. D.T. Smith*, OCSC, 748117 (1995)
13 j. *The Vista Monte-Niguel Ranch HOA v. D.T. Smith*, OCSC, 748116 (1995)
14 k. *Wade v. JCC Homes*, LASC/South, NC018244 (1996)
15 l. *Cox v. J.C.C. Enterprises*, SBSC, SCV50465 (1998)
16 m. *Steiger v. J.C.C. Enterprises*, LASC, KC028271 (1998)
17 n. *Archbold v. D.T. Smith*, OCSC, 791323 (1998)
18 o. *Silverman v. Villa Serena*, Riverside Superior Court/Indio, INC018636 (2000)
19 p. *Stern v. EPAC Dos Vientos Partners*, Ventura Superior Court/East, SC032195
20 (2003)
21 q. *Olson v. Coldwell Banker*, OCSC/Complex, 05CC08332 (2005)
22 r. *Wilshire-Sieroty v. Lennar Homes*, LASC, BC379721 (2007)
23 s. *Kofdarali v. Adams*, OCSC/Complex, 07CC09969 (2009)
24 t. *Rubin v. Standard Pacific*, OCSC/Complex, 30-2011-00471183 (2011)
25 u. *Flynn v. Standard Pacific*, OCSC/Complex, 30-2010-00371011 (2011)

26 7. I have been practicing law for 37 years and founded my firm in 1990. I received
27 my Juris Doctorate from Stanford University Law School in 1985. During law school, I
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1 externed on a full-time basis for the White House Legal Counsel, Washington D.C. in 1984. I
2 have also been awarded a BV Peer Review Rating by LexisNexis Martindale-Hubbell. The BV
3 Peer Review Rating identifies a lawyer with high to very high legal ability. I and my firm are
4 also recognized by Best Lawyers for 2022 and 2023.

5 8. I have extensive experience with construction defect and delay claims litigation
6 representing numerous developers and contractors in litigation concerning both residential
7 multi-unit condominium and tract developments. These cases have included projects ranging
8 from one unit to over 1,000 units and commercial projects. Although primarily involved in
9 representing developers, owners, and general contractors, I have represented subcontractors as
10 well.

11 9. In addition, my firm's experience includes (1) ongoing representation of 6,500
12 wildfire victims with over \$1 billion in claims; (2) representing nearly 200 clients in the 2017
13 Vegas Shooting Cases, that included four wrongful death cases and numerous serious injury
14 cases, with a combined total of over \$40 million in settled claims. I also serve as president of
15 the UCI Law Dean's Advisory Board.

16 10. My firm has been actively litigating this class action matter as well as the other
17 related cases, most of which have been pending for over 9 years now.

18 11. My experience is commensurate with that of a partner at any "blue-chip" law
19 firm such as Gibson, Dunn & Crutcher, Paul, Hastings, Janofsky & Walker, O'Melveny &
20 Meyers, or Latham & Watkins. In fact, I likely have more trial experience than most senior
21 litigators in any of those firms, as evidenced by my extensive trial record. I also started my
22 career at Paul Hastings, where I worked for two years.

23 12. My partner, Michael H. Artinian, Esq., has also worked extensively on this case
24 from the outset. Mr. Artinian has been practicing law for 23 years and has been associated with
25 Bridgford, Gleason & Artinian since 2008. Mr. Artinian received his Juris Doctorate from the
26 University of San Francisco School of Law in 1999. He was an editor on the Law Review, as
27 well as a Moot Court member. Mr. Artinian has extensive experience litigating cases in federal
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1 and state courts throughout California, including complex and class-action matters in the area of
2 construction defect litigation.

3 13. Michael H. Artinian, Esq. has experience litigating class action matters. Prior to
4 joining Bridgford, Gleason & Artinian in 2008, Michael Artinian litigated class action cases on
5 the defense side involving wage and hour issues, and fuel measuring. Examples of those cases
6 are:

- 7 a. *Wendell v. Circle K Stores, Inc.*, SBSC/Western, SCVSS 089464 (2002)
- 8 b. *Wehe v. Philips 66 Co.*, OCSC, 089464 (2002)
- 9 c. *Rushing v. Ambest, Inc., et al.* (No. 2:07-cv-02300-KHV-JPO) N.D. Cal. No.
10 3:06-cv-07621-PJH (*In RE Motor Fuel Temperature Sales Parties litigation*,
11 MDL, US District Court - District of Kansas) (2005).
- 12 d. *West v. Circle K Stores, Inc.*, USDC/E.D. Cal., CIV.S-04-0438 WBS GGH
13 (2005).

14 14. I have also been assisted in this matter by my associate, Brian P. Donoghue. Mr.
15 Donoghue has been practicing law for 14 years and has been associated with Bridgford,
16 Gleason & Artinian since 2012. Mr. Donoghue received his Juris Doctorate from the Chapman
17 University School of Law in 2008. Prior to joining Bridgford, Gleason & Artinian in 2012, Mr.
18 Donoghue worked for a firm specializing in construction defect and real estate litigation. Mr.
19 Donoghue has been involved from before the filing of all of the pending related pinhole class
20 action cases.

21 15. Over the course of the litigation of this and the related actions, Plaintiffs have
22 engaged in extensive legal research, motion practice, appellate practice, discovery, class
23 certification, and trial preparation. These efforts include researching general theories of pinhole
24 leaks, including applicability of SB 800 and other laws to the facts of this case under several
25 theories of liability; collecting pipe samples from homeowners that contained the pinhole leaks,
26 retaining and conferring with experts, and providing bids for repairs; obtaining detailed
27 information about various contractors used by builders on 70 separate developments in Ladera
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1 Ranch, Yorba Linda, Irvine and San Clemente; researching the Water Districts; and obtaining
2 extensive information from homeowners in the area complaining of pinhole leaks, including the
3 time and place of pinhole leaks experienced, which companies made repairs, and the builder's
4 responses to each report of a leak. Class Counsel has also thoroughly reviewed the relevant
5 facts and documents supporting the various claims made as alleged in the litigation. Plaintiffs
6 have conducted class certification related discovery, including taking the depositions of
7 corporate representatives from Defendants and SMWD, propounding and/or responding to
8 document requests, special interrogatories and requests for admission, and reviewing all of the
9 documents produced in this action. My firm has been involved in all of the foregoing.

10
11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct. Executed this 3rd day of February 2023, at Newport Beach,
13 California.

14
15 /s/ Richard K. Bridgford
16 Richard K. Bridgford, Esq.

PROOF OF SERVICE
Shah v. Pulte Homes, et al.
Orange County Superior Court Case No.: 30-2014-00731604

I, the undersigned, declare that:

I am over the age of 18 years and not a party to the within action. I am employed in the County where the Proof of Service was prepared and my business address is Law Offices of BRIDGFORD, GLEASON & ARTINIAN, 26 Corporate Plaza, Suite 250, Newport Beach, CA 92660.

On the date set forth below, I served the following document(s): **DECLARATION OF RICHARD BRIDGFORD IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** on the interested party(s):

SEE ATTACHED SERVICE LIST

by the following means:

- () **BY MAIL:** By placing a true copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid. I am readily familiar with the business practice for collecting and processing correspondence for mailing. On the same day that correspondence is processed for collection and mailing it is deposited in the ordinary course of business with the United States Postal Service in Newport Beach, California to the address(es) shown herein.
- () **BY PERSONAL SERVICE:** By placing a true copy thereof, enclosed in a sealed envelope, I caused such envelope to be delivered by hand to the recipients herein shown (as set forth on the service list).
- () **BY OVERNIGHT DELIVERY:** I served the foregoing document by Overnight Delivery as follows: I placed true copies of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed to recipients shown herein (as set forth on the service list), with fees for overnight delivery paid or provided for.
- (X) **BY ELECTRONIC MAIL (EMAIL):** I caused a true copy thereof sent via email to the address(s) shown herein.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: February 3, 2023

/s/Debbie Knipe

Debbie Knipe

SERVICE LIST

Shah v. Pulte Homes, et al.

Orange County Superior Court Case No.: 30-2014-00731604

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