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DECLARATION OF ELISSA D. MILLER

I, ELISSA D. MILLER, declare:

1. I am the chapter 7 trustee for the bankruptcy estate of Girardi Keese. I know the facts contained in this declaration from my own personal knowledge and, if called as a witness, could and would competently testify with respect thereto.

2. On December 18, 2020 (the "Petition Date"), an involuntary chapter 7 bankruptcy petition ("Petition") was filed against Girardi Keese. As of the filing of the involuntary petition, Girardi Keese was counsel of record in a significant number of matters which were undertaken on a contingency fee basis.

3. The petitioning creditors moved for the appointment of an interim trustee, which was granted by the Court by order entered January 5, 2021. I was appointed as the interim chapter 7 trustee on January 6, 2021. The order for relief was entered January 13, 2021 and, the same date, I was reappointed and has been serving in that capacity since. As trustee, I am in control of all of Girardi Keese's books and records, both in paper and electronically.

4. Because I did not become involved in this case until January 6, 2021, and was never employed by Girardi Keese, I do not have personal knowledge about the work that Girardi Keese performed on any given case. However, in order to collect fees to which the estate is entitled, I have a process in place to help me and my counsel evaluate the amount of work performed in a case and the length of time of Girardi Keese's involvement. I have contracted with a former Girardi Keese attorney to whom I have given access to Girardi Keese's electronic files and who, because of his work with the firm, understands the electronic filing system and knows how to obtain the relevant information.

5. I understand that Alexandra Steele of Steele Cooper Law, in her capacity as class counsel in *Staats v. City of Palo Alto, et al.*, Case No. 1:15-cv-284956, is submitting a declaration regarding her work in connection with that case, both while she was an attorney employed by Girardi Keese, while she served as a consultant on the case after she left Girardi Keese, and when she associated into the case. I have reviewed the declaration that I understand is being

1 concurrently filed with my declaration and shared it with the former Girardi Keese attorney who
2 then compared it to Girardi Keese's electronic files. I am informed that the declaration is
3 consistent with these files, that Ms. Steele was the attorney at Girardi Keese with primary
4 responsibility for this case, and that a significant amount of work was performed on this matter by
5 Ms. Steele and others at Girardi Keese.

6 I declare under penalty of perjury under the laws of California that the foregoing is true
7 and correct and that this declaration was executed August 10, 2021, in Studio City, California.

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12 ELISSA D. MILLER
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