

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION
Case No.: 4:22-CV-00033-BO

HANK BLAND, KENDELL)
JACKSON, and LUETTA INNISS,)
on behalf of themselves and all)
others similarly situated,)
)
Plaintiffs,)
)
v.)
)
CAROLINA LEASE)
MANAGEMENT GROUP, LLC,)
CTH RENTALS, LLC, and)
OLD HICKORY BUILDINGS, LLC,)
)
Defendants.)
_____)

**DECLARATION OF
COUNSEL IN SUPPORT
OF CLASS
REPRESENTATIVES'
SERVICE AWARD**

I, Adrian M. Lapas, do hereby make this declaration supporting the request for service awards for Hank Bland, Kendell Jackson, and Luetta Inniss, as Class Representatives for their service to the class throughout this litigation. This statement is made under penalty of perjury and pursuant to 28 U.S.C. § 1746. I hereby depose and say as follows:

1. I am one of the attorneys of record in the above-captioned action and have been appointed as one of the class counsel for the settlement class in this case.
2. I have been in an attorney-client relationship with the Plaintiffs Hank Bland and Kendell Jackson since before this case was filed and with Plaintiff Luetta Inniss shortly after this case was filed.

3. Over the course of my representation of Plaintiffs, I know the efforts each has put forth as I have communicated with each of them extensively throughout the course of this litigation.

4. As a general matter, throughout the course of this litigation, I routinely sent copies of documents for this case to Plaintiffs, letters providing status updates, letters advising as to general litigation strategies, letters and emails requesting responses to documents sent, and requesting additional documentation and information as to each individual Plaintiffs' transactions with Defendants. Throughout this litigation, each Plaintiff appeared to be familiar with such documents when I would speak with them, and to have tried to understand and keep abreast of this case. Each Plaintiff was always responsive to any requests to speak with me by telephone or to provide additional information.

5. With regards to the individual Plaintiffs' efforts in this case, all three Plaintiffs:

a) provided to counsel the documentation that each had in their possession as to the contracts entered into with Defendants;

b) reviewed their personal documentation to reconstruct their payment histories to Defendant Carolina Lease Management Group and provided such to counsel;

c) spoke at length on multiple occasions with counsel regarding each Plaintiff's transaction with the local retailer for each Plaintiff's shed;

d) was generally available to assist counsel with making decisions as to the scope and course of the litigation.

6. Additionally, each Plaintiff was required to respond to written discovery from Defendant Carolina Lease Management Group including interrogatories and requests for admission. In formulating their responses, each Plaintiff reviewed their own documentation as well as documentation produced over the course of the litigation relevant to their responses, consulted with counsel for assistance and finalized their responses.

7. Each Plaintiff was also deposed by Defendants. In preparation for these depositions, I requested that each Plaintiff review their written discovery responses and documentation. During the deposition preparation with me and my co-counsel, each Plaintiff affirmed they had done so.

8. Plaintiff Bland drove approximately 92.2 miles roundtrip to meet at counsel's office for approximately 2 hours to discuss his testimony and to prepare for the deposition. Plaintiff Jackson drove approximately 141 miles roundtrip to meet at counsel's office to discuss his testimony and to prepare for his deposition, also spending approximately two hours with counsel in preparation.

9. The next day, both Plaintiff Bland and Jackson drove to counsel's office for their respective depositions with each lasting approximately one and one-half hours.

10. Prior to her deposition, Plaintiff Inniss had moved from North Carolina to Georgia. She met with counsel prior to her deposition through videoconferencing

for approximately one and one-half hours to discuss her testimony and prepare for her deposition. Two days later, Plaintiff Inniss drove approximately 36 miles roundtrip from her home to an attorney's office in Augusta, Georgia, for her deposition which lasted approximately one hour.

11. Plaintiffs also participated in the mediated settlement conference in this case. Plaintiffs' counsel notified all plaintiffs of the mediation and sent a mediation information sheet to the plaintiffs. All three plaintiffs verified that they were on telephone stand-by to discuss any issues that may come up including if any settlement offers were submitted. Though little was required of Plaintiffs during the actual mediation settlement conference, all three Plaintiffs were available for approximately 3.2 hours during the mediation.

12. While Plaintiffs' counsel was deposing Defendants' corporate representatives, settlement negotiations commenced in earnest. During this time, each Plaintiff was responsive to Counsel's phone calls regarding the settlement negotiations and making decisions with regard to the proposals to settle the case. As settlement negotiations continued, all three Plaintiffs remained responsive until ultimately an agreement was reached.

This the 23rd day of September, 2025.

s/ Adrian M. Lapas
Adrian M. Lapas