

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

JULIANNE HEIGL, individually and on behalf  
of all others similarly situated,

Plaintiff.,

v.

WASTE MANAGEMENT OF NEW YORK,  
LLC,

Defendant.

Civil Action No. 1:19-cv-05487-WFK-ST

**DECLARATION OF JULIANNE HEIGL IN SUPPORT OF PLAINTIFF'S MOTION  
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND MOTION FOR  
ATTORNEYS' FEES, COSTS, EXPENSES, AND INCENTIVE AWARD**

I, Julianne Heigl, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an adult over the age of 18 and a resident of the State of New York. I am the Class Representative in the lawsuit entitled *Heigl v. Waste Management of New York, LLC*, Case No. 1:19-cv-05487-WFK-ST, currently pending in the United States District Court for the Eastern District of New York. I make this Declaration in support of (i) the Motion for Final Approval of Settlement, and (ii) the Motion for Attorneys' Fees, Costs, Expenses, and Incentive Award. The statements made in this Declaration are based on my personal knowledge and, if called as a witness, I could and would testify thereto.

2. For approximately 5 years, I have been a customer of Defendant with a residential waste collection subscription. From 2016 until I filed this lawsuit, Defendant charged me an Administrative Charge to receive my paper billing statement and/or pay by United States mail.

3. I assisted with the litigation of this case by detailing my account history and the Administrative Charges associated therewith. Specifically, I described to my lawyers my

relationship as a customer of Defendant, and the Administrative Charges I paid. I also provided my lawyers with documentation confirming the same.

4. I also worked with my attorneys to prepare the Class Action Complaint. I carefully reviewed the Class Action Complaint for accuracy and approved it before it was filed.

5. During the course of this litigation, I kept in regular contact with my lawyers. Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case. We also discussed case strategy, anticipated motions, document and deposition discovery, and the prospects of settlement. Furthermore, when appropriate, I informed my attorneys of additional facts for their research and consideration.

6. I also coordinated with my lawyers to search for documents that Defendant requested in formal discovery, such as copies of my billing statements. And I assisted my lawyers in preparing responses to Defendant's interrogatories. I was also prepared to testify at deposition and trial, if necessary.

7. My lawyers have kept me well informed in regard to the efforts to resolve this matter. I discussed the Class Action Settlement Agreement with them and gave my approval prior to signing it.

8. Based on the interactions and my relationship with my attorneys, I believe they have fairly and adequately represented me and the Settlement Class and will continue to do so.

9. Throughout this litigation, I understood that, as a Class Representative, I have an obligation to protect the interests of other Settlement Class Members and not act just for my own personal benefit. I do not have any conflicts with other Settlement Class Members. I have done my best to protect the interests of other Settlement Class Members and will continue to fairly and adequately represent the Settlement Class to the best of my ability.

10. I estimate that I spent approximately 40 hours working with my lawyers on this case.

I declare under penalty of perjury that the above and foregoing is true and accurate.

Executed this 16th day of October 2020 at Hamburg, New York.

*Julianne Heigl*  
Julianne Heigl (Oct 16, 2020 19:23 EDT)  
Julianne Heigl






# 2020.10.16 Heigl Declaration

Final Audit Report

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