

EXHIBIT 6

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ISRAEL ALVARADO, *et al.*,

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Plaintiffs,

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v.

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Case No.: 1:22-cv-00876-AJT-JFA

LLOYD AUSTIN, III, *et al.*,

:

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Defendants.

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**DECLARATION OF J. ANDREW MEYER IN SUPPORT OF
MOTION FOR CLASS CERTIFICATION**

I, J. Andrew Meyer, pursuant to 28 U.S.C. §1746, declare as follows:

1. My name is J. Andrew Meyer and I am over the age of 18.

2. I am an attorney duly admitted to practice law in the states of Florida and New Jersey, having been admitted to the Florida Bar in 1995 and the bar of New Jersey in 1996. I am currently in good standing with both.

3. I submit this declaration in support of the Plaintiffs’ Motion for Class Certification. The facts stated are true of my own personal knowledge and if called to testify to such facts, I could and would do so competently.

4. I am the principal of the Finn Law Group, P.A. located in St. Petersburg, Florida. I have been retained by Plaintiffs to represent them in this action as co-counsel with Mr. Arthur A. Schulcz, Sr. and Mr. Brandon Johnson, who are each submitting their own declarations in support of the present motion for class certification.

5. I am an experienced class action attorney who has since 2005 focused my practice on class actions on behalf of individuals as plaintiffs. I have litigated complex class action cases

in state and federal courts throughout the country, with those cases ranging from class actions involving consumer products and consumer protection statutes, to civil rights class actions and insurance and banking class actions brought on behalf of consumers, as well as class actions brought under the TCPA and FDCPA.

6. I have previously served or been court appointed as class counsel in cases involving allegations by plaintiffs of civil rights or constitutional law violations. For example, I was appointed class counsel in the matter *In re Black Farmers Discrimination Litigation*, Case No. 08-ML-0511-PLF (District Court for the District of Columbia), a case resulting in a \$1.2 billion settlement for farmers subjected to discrimination by the USDA. I served as class counsel in *DeHoyos v. Allstate Corp.*, Case No. 01-CA-1010-FB (District Court for the Western District of Texas), a case involving a class of African-American and Hispanic insureds alleging racial discrimination in the underwriting of homeowners' insurance. I was appointed as class counsel in *Lea Family Partnership, Ltd. v. City of Temple Terrace*, Case No. 8:16-cv-03463 (District Court for the Middle District of Florida) in which Plaintiffs alleged that the City of Temple Terrace violated class members' constitutional rights through an unlawful rental housing inspection ordinance.

7. I have been involved in a number of class action matters consolidated by the Judicial Panel on Multidistrict Litigation, and in one of those matters, served as co-lead counsel in a case styled *In re Collecto, Inc. Telephone Consumer Protection Act (TCPA) Litigation*, Case No. 14-md-2513-RGS (District Court for the District of Massachusetts), an MDL proceeding involving alleged violations of the TCPA. I also served as a member of the Plaintiffs' Steering Committee in the case of *In Re: Apple iPhone 3G and 3GS "MMS" Marketing and Sales Practices Litigation*, MDL No. 2116 (District Court for the Eastern District of Louisiana). I presently have a member

case before this Court in *In Re: Capital One Customer Data Security Breach Litigation*, Case Number 1:19-md-02915-AJT-JFA, although I did not play any active role in those proceedings beyond attending an early plaintiffs' organizational meeting.

8. I have been involved in class action cases brought on behalf of elderly consumers who alleged they were duped into purchasing certain deferred annuity products, with one notable example being *Healey v. Allianz Life Ins. Co. of North Am.*, Case No. 05-cv-8908 (District Court for the Central District of California). I also served as class counsel in a case in West Virginia, *Nicholes v. Combined Insurance Co. of America*, Case No. 16-cv-10203 (District Court for the Southern District of West Virginia) involving allegations of the improper sale of insurance to low-income and elderly consumers.

9. I was appointed co-lead counsel *In re TracFone Unlimited Service Plan Litigation*, Case No. 13-cv-03440-EMC (District Court for the Northern District of California), a case involving allegations of deceptive trade practices in the advertising of wireless service plans. I was appointed co-lead counsel in *Paugh v. Walgreen Company*, Case No. 12-cv-21229-JEM in District Court for the Southern District of Florida, a case involving allegations of deceptive trade practices in the labeling of a food product. In state court in Florida, I was appointed as co-lead class counsel in *Algarin v. Tivoli Community Developers, Inc.*, Case No. 2008-CA-000193-O (Florida 9th Judicial Circuit Court, Orange County), a case which involved a class of homeowners alleging they had been misled into purchasing homes located on a former WWII bombing range.

10. I have served as lead class counsel in an FDCPA class action in the Southern District of Florida, *Patterson v. Greenspoon Marder*, Case No. 16-cv-60025, and was appointed as lead class counsel in an FDCPA class action case styled *Narvaez v. Law Offices of Antonio Duarte*, Case No. 14-cv-1646-VMC in the Middle District of Florida. I served as co-lead counsel

in a case where the Court certified a class in an action against Progressive Insurance Company relating to the denial of PIP coverage, *AA Suncoast Chiropractic, et al v. Progressive American Ins., et al.* Case No. 8:15-cv-02543, and as co-lead class counsel in *Lieber v. Bank of America, N.A.*, Case No. 2012-3622-CI-91S (Florida 6th Judicial Circuit Court, Pinellas County), a case involving allegations of unlawful debt collection activity by a national bank. I also served as class counsel in an action alleging violations of the FCRA by a timeshare developer filed in the Southern District of Florida, *Best v. Bluegreen Corp.*, Case No. 9:14-cv-80929.

11. In the event the Court grants Plaintiffs' Motion for Class Certification, I will continue to vigorously represent the interests of the named Plaintiffs and the proposed Class and Sub-Classes.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of September, 2022, in St. Petersburg, Florida.

/s/J. Andrew Meyer

J. Andrew Meyer, Esq.