

EXHIBIT 1
(MAY 26, 2015 DECLARATION
OF IRA T. KASDAN, ESQ.)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

EPHRAIM GREENBERG, *individually on behalf of himself, and on behalf of all others similarly situated,*

Plaintiff,

- versus -

CAROLYN W. COLVIN, *in her official capacity as Acting Commissioner of the Social Security Administration, and*

**THE SOCIAL SECURITY
ADMINISTRATION,**

Defendants.

Case 1:13-cv-01837-RMC

**DECLARATION OF IRA T. KASDAN, ESQ. IN SUPPORT
OF CLASS COUNSEL'S REPLY TO DEFENDANTS' RESPONSE TO CLASS
COUNSEL'S APPLICATION FOR ATTORNEYS' FEES UNDER 42 U.S.C. § 406(b)**

I, Ira T. Kasdan, declare under penalty of perjury as follows:

1. I am a member of the bar of the District of Columbia and a member of the firm of Kelley Drye & Warren LLP (“Kelley Drye”), which the Court has appointed as Class Counsel for plaintiffs in the above-captioned action (“Plaintiffs” or “Class Members”). Kelley Drye’s offices are located at 3050 K Street N.W., Suite 400, Washington, D.C. 20007.

2. I make this declaration based on my personal knowledge. I submit this declaration in support of Class Counsel’s Reply to Defendants’ Response to Class Counsel’s Application for Attorneys’ Fees under 42 U.S.C. § 406(b).

3. Class Counsel’s Reply supports Class Counsel’s Application for Attorneys’ Fees, which seeks compensation for Class Counsel in the amount twenty-five percent (25%) of each

payment of past-due benefits made by the Social Security Administration as a result of this class action case.

4. Class Counsel's work on and commitment to this litigation has continued, even though the settlement has been agreed to by Defendant Carolyn Colvin, in her official capacity as Acting Commissioner of the Social Security Administration, and Defendant the Social Security Administration (collectively, "Defendants" or "SSA") and filed with this Court. Class Counsel continues to explain the detailed claims process to potential Class Members.

5. Class Counsel has received e-mail inquiries from approximately fifty (50) potential Class Members and telephone calls from about twenty (20) others. Class Counsel has responded to these e-mails personally and has not relied on paralegals, secretaries or an automatic call center to address these questions.

6. Class Counsel's quick responses to questions have garnered appreciation from potential Class Members. Some example are as follows:

- "Beth, I love you! Most of all for responding so quickly and so personally – i.e., no form letters. Thanks for the information. We'll probably be in touch again."
- "Dear Mr. Kasdan. Thank you so much for your swift reply."
- "Hi Beth: Thank you very much for your quick and detailed reply to my questions. I really appreciate it."
- "Thank you for the quick reply, Beth. I will watch for further communications."
- "Dear Mr. Kasdan: Many thanks for your prompt reply."
- "Thank you ever so much for your 'lightening' reply."
- "Thanks for the quick reply. Got two questions. . . ."

- “Dear Mr. Kasdan; Thank you for your immediate response. My wife and I very much appreciate your assistance in this matter.”
- “Dear Ms. Johnson, Thank you for your prompt response.”

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

Executed May 26, 2015 at Washington, District of Columbia.

/s/ Ira T. Kasdan
Ira T. Kasdan