

**EXHIBIT 2**  
**Declaration of**  
**Daniel M. Hutchinson**

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

ELIJAH CARIMBOCAS, LINDA  
DLHOPOLSKY, and MORGAN GRANT,  
on behalf of themselves and others  
similarly situated,

*Plaintiffs,*

v.

TTEC SERVICES CORPORATION, et  
al.,

*Defendants.*

Case No. 1:22-cv-02188-CNS-STV

Hon. Charlotte N. Sweeney

Magistrate Judge Scott T.  
Varholak

**DECLARATION OF DANIEL M. HUTCHINSON**

Pursuant to 28 U.S.C. § 1746, I, Daniel M. Hutchinson, declare as follows:

1. I am a partner in of the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP (“LCHB”), counsel of record for Plaintiffs in this matter. I, with co-counsel at Werman Salas P.C., have been one of the lawyers primarily responsible for the prosecution of Plaintiffs’ claims on behalf of the Settlement Class.

2. I am admitted to practice before this Court and am a member in good standing of the bar of the State of California; the United States District Court for the Central, Northern, and Southern Districts of California; the United States District Court for the Eastern District of Wisconsin; and the U.S. Courts of Appeals for the First, Second, Fourth, Seventh, Ninth, and Eleventh Circuits. I am a member in good standing of the Illinois State Bar and I am licensed to practice law in all courts of the State of Illinois.

3. My background, experience and professional experience are detailed in my declaration filed on the docket (ECF No. 99-3) as part of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and is not repeated here.

4. My firm undertook this action on an entirely contingent fee basis, shouldering the risk that this litigation would yield no recovery and leave them wholly uncompensated for their time, as well as for their out-of-pocket expenses.

5. My firm has performed substantial work in this case. For example, LCHB attorneys and paralegals have expended 418.5 attorney hours prosecuting this litigation to date, representing a lodestar of \$372,943.50. See Exhibit 1.

6. In addition, my firm has incurred litigation expenses in the amount of \$15,503.33. See Exhibit 2. These expenses were reasonable and were of the type typically charged to hourly paying clients.

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

Executed this November 21, 2025, in San Francisco, California.



Daniel M. Hutchinson  
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