

C.A. No. 2022-0721-JTL

4936-1839-9558.v3

4. The information in this Affidavit regarding the Firm's time and expenses is taken from time and expense reports and supporting documentation prepared and maintained by the Firm in the ordinary course of business. I am the partner who oversaw and conducted the day-to-day activities in the Action and I reviewed these reports in connection with the preparation of this Affidavit. The purpose of this review was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness of, the time and expenses committed to the Action. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment, including excluding hours for timekeepers recording fewer than 5.0 total hours. Based on these reviews and the adjustments made, I believe that the time reflected in the Firm's lodestar calculation and the costs and expenses for which payment is sought herein are reasonable and were necessary for the effective and efficient prosecution and resolution of the Action.

5. After the reductions referred to above, the number of hours spent on the Action by the Firm from inception through October 3, 2024 (the date the parties accepted the proposal to settle the Action) is 736.60 for a total lodestar of \$699,569.00. A breakdown of the Firm's hours from inception through October 3, 2024, is as follows:

NAME		HOURS	RATE	LODESTAR
Baron, Randall J.	(P)	48.30	1270	\$ 61,341.00
Goodman, Benny C.	(P)	101.70	1045	106,276.50
Luedeke, Erik W.	(P)	307.80	980	301,644.00

NAME		HOURS	RATE	LODESTAR
Lyons, Christopher H.	(P)	87.70	990	\$ 86,823.00
Bolton, Tayler D.	(A)	8.40	590	4,956.00
Avellino, Jason M.	(OC)	108.40	885	95,934.00
Downs III, Travis E.	(OC)	15.40	1195	18,403.00
Brandon, Kelley T.	(I)	22.00	370	8,140.00
McDade, Jaime A.	(PL)	36.90	435	16,051.50
TOTAL		736.60		\$ 699,569.00

(P) – Partner; (A) – Associate; (OC) – Of Counsel; (I) - Investigator; (PL) – Paralegal

6. After the reductions referred to above, the number of hours spent on the Action by the Firm from October 4, 2024, through April 2, 2025 (the date the Stipulation and Agreement of Compromise, Settlement, and Release (“Settlement Stipulation”) was filed), is 52.30 for a total lodestar of \$55,245.00. A breakdown of the Firm’s hours from October 4, 2024, through April 2, 2025, is as follows:

NAME		HOURS	RATE	LODESTAR
Baron, Randall J.	(P)	17.10	1270	\$ 21,717.00
Luedeke, Erik W.	(P)	22.20	980	21,756.00
Lyons, Christopher H.	(P)	9.40	990	9,306.00
Avellino, Jason M.	(OC)	2.00	885	1,770.00
McDade, Jaime A.	(PL)	1.60	435	696.00
TOTAL		52.30		\$ 55,245.00

(P) – Partner; (OC) – Of Counsel; (PL) – Paralegal

7. After the reductions referred to above, the number of hours spent on the Action by the Firm from inception through April 2, 2025 is 788.90 for a total lodestar of \$754,814.00. A breakdown of the Firm’s hours from inception through April 2, 2025, is as follows:

NAME		HOURS	RATE	LODESTAR
Baron, Randall J.	(P)	65.40	1270	\$83,058.00
Goodman, Benny C.	(P)	101.70	1045	106,276.50
Luedeke, Erik W.	(P)	330.00	980	323,400.00
Lyons, Christopher H.	(P)	97.10	990	96,129.00
Bolton, Tayler D.	(A)	8.40	590	4,956.00
Avellino, Jason M.	(OC)	110.40	885	97,704.00
Downs III, Travis E.	(OC)	15.40	1195	18,403.00
Brandon, Kelley T.	(I)	22.00	370	8,140.00
McDade, Jaime A.	(PL)	38.50	435	16,747.50
TOTAL		788.90		\$ 754,814.00

(P) – Partner; (A) – Associate; (OC) – Of Counsel; (I) - Investigator; (PL) – Paralegal

8. The Firm also has \$28,212.63 in expenses and charges in connection with the prosecution of the Action from inception to date. The expenses and charges are summarized by category below:

CATEGORY		AMOUNT
Filing and Attorney Service Fees		\$ 553.00
Transportation, Hotels, and Meals		6,581.82
In-House Telephone		13.15
In-House Messenger		84.06
Trial/Court Transcripts		241.75
Experts (Matthew D. Cain (d/b/a Cleveland Analytics, LLC))		3,500.00
Outside Photocopies		82.02
Online Legal and Financial Research		304.33
eDiscovery Database Hosting		205.00
Mediation Fees		16,647.50
Hochberg ADR	\$ 10,585.00	
Phillips ADR Enterprises, P.C.	6,062.50	
TOTAL		\$ 28,212.63

9. The expenses pertaining to this case are reflected in the Firm's books and records which are prepared from receipts, expense vouchers, check records, and other documents and are an accurate record of the expenses.

