

4. I am currently licensed and in good standing to practice law in the state of Washington and the state of Wisconsin, and have been admitted to practice law in several federal district courts across the country, including:

- U.S.D.C., Western District of Washington;
- U.S.D.C., Eastern District of Washington;
- U.S.D.C., Western District of Wisconsin;
- U.S.D.C., Eastern District of Wisconsin; and
- U.S.D.C., Northern District of Illinois.

I am in good standing in every jurisdiction in which I have been admitted to practice.

Additionally, I have been admitted to practice *pro hac vice* in various federal district courts across the country, including:

- U.S.D.C., Central District of California;
- U.S.D.C., Northern District of California;
- U.S.D.C., Southern District of California;
- U.S.D.C., District of Maryland;
- U.S.D.C., District of Massachusetts;
- U.S.D.C., District of Minnesota;
- U.S.D.C., Eastern District of Missouri;
- U.S.D.C., Western District of Missouri;
- U.S.D.C., District of New Jersey;
- U.S.D.C., Eastern District of New York;
- U.S.D.C., Southern District of New York;
- U.S.D.C., Northern District of Ohio;

- U.S.D.C., Southern District of Ohio; and
- U.S.D.C., Eastern District of Tennessee.

5. I have practiced law since 2013 and have substantial class action and complex litigation experience, particularly involving the Telephone Consumer Protection Act. Over the course of my career, the cases in which I have represented plaintiffs have resulted in the recovery of hundreds of millions of dollars for consumers. I concentrate my practice in class action litigation with an emphasis on consumer protection and privacy issues. I have a national practice and appear in federal courts across the country.

B. The Turke & Strauss Team

6. Other Turke & Strauss attorneys and professionals are members of this case team and contributed to the results on behalf of the Class. Each team member, along with co-counsel, brought unique skills and experience to the case to address issues that arose during the various stages of the litigation: The Turke & Strauss attorneys and staff members who have expended substantial amounts of time on this case include the following:

7. Mary C. Turke is a founding member of Turke & Strauss. Ms. Turke is an active member of the Wisconsin State Bar and concentrates her practice in civil and commercial litigation. Ms. Turke regularly prosecutes consumer class actions, including those involving violations of the Telephone Consumer Protection Act and the Illinois Biometric Information Privacy Act. Mr. Turke has extensive experience representing parties in multi-national disputes in both state and federal courts throughout the United States. Ms. Turke received her *J.D. cum laude* from the University of Wisconsin Law School in 1996. Prior to forming Turke & Strauss in May 2016, Ms. Turke was the managing partner of the Madison, Wisconsin office of Michel Best & Friedrich LLP, where she practiced civil litigation. Ms. Turke has repeatedly been named

to the annual Wisconsin Super Lawyers list (2011-2020) by SuperLawyers Magazine as well as The Best Lawyers in America® list (2013-2020) by Woodward/White, Inc. In 2017, shortly after forming Turke & Strauss, Ms. Turke received the Legal Innovator Award from the Wisconsin State Bar.

8. Alex Phillips is an associate at Turke & Strauss. Mr. Phillips received his J.D. from the University of Wisconsin School of Law in 2017 and is an active member of the Wisconsin State Bar as well as the Dane, Jefferson, and Dodge County Bar Associations. Mr. Phillips concentrates his practice in complex class action litigation and commercial litigation. He has represented both plaintiffs and defendants in high stakes litigation. Mr. Phillips has successfully obtained trial verdicts on behalf of his clients as well as negotiated numerous high-value settlements.

9. Zog Begolli is an associate at Turke & Strauss. Mr. Begolli received his J.D. from the University of Wisconsin School of Law in 2017 and is an active member of the Wisconsin State Bar. Mr. Begolli concentrates his practice in complex class action litigation, with an emphasis on cases involving the Telephone Consumer Protection Act, the Illinois Biometric Information Privacy Act, various states' consumer protection acts, and financial industry regulations.

10. Jonathan Sopha is an attorney with Turke & Strauss. Mr. Sopha received his J.D. *cum laude* from the University of Wisconsin Law School in 2001. In his 20 years as an attorney, Mr. Sopha has represented individuals, government entities, and a variety of business and other organizations in an array of matters. Mr. Sopha also maintains a commercial real estate and business advising practice.

11. Austin Doan is an associate with Turke & Strauss. Mr. Doan received his J.D. from the University of Wisconsin Law School in 2017 and is an active member of the Wisconsin State Bar. Mr. Doan focuses his practice on complex class action and commercial litigation, including cases involving violations of the Telephone Consumer Protection Act. Prior to joining Turke & Strauss, Mr. Doan was a staff attorney for the Dane County Circuit Court in Wisconsin.

12. Rudis Requeno is a legal assistant at Turke & Strauss. Mr. Requeno is qualified to perform legal work based on his training and experience working for attorneys. The work performed by Mr. Requeno was work that required sufficient knowledge of legal concepts that I or another attorney would have had to perform absent such assistance.

13. Mike Roberts was a legal assistant at Turke & Strauss. Mr. Roberts is qualified to perform legal work based on his training and experience working for attorneys. The work performed by Mr. Roberts was work that required sufficient knowledge of legal concepts that I or another attorney would have had to perform absent such assistance.

C. Law Firm Overview

14. Turke & Strauss is a law firm based in Madison, Wisconsin that focuses on complex civil and commercial litigation with an emphasis on consumer protection, privacy, employment, wage and hour, business, real estate, and debtor-creditor matters. The attorneys of Turke & Strauss have extensive experience in complex litigation, including class actions. I have been appointed class counsel in cases at the federal level. The attorneys of Turke & Strauss have prosecuted a variety of multi-million-dollar consumer fraud, product defect, privacy, and antitrust class actions. The defendants in these cases have included companies such as Wells Fargo Bank, N.A., LG Electronics U.S.A., Inc., The Clorox Company, Best Buy, Monsanto Company, Kimpton Hotel & Restaurant Group, LLC, Stearns Lending, LLC, Fiat Chrysler Automobiles, and American Power & Gas.

D. Work Performed by Turke & Strauss

15. The regular practice at Turke & Strauss is for all attorneys and staff to keep contemporaneous time records, maintained on a daily basis, and describing tasks performed in 0.1 hour increments. Firm policy requires all staff to enter their time into an electronic timekeeping system on a daily basis.

16. I carefully reviewed my firm's internal time records and eliminated any duplicate work, time spent reviewing work done by other attorneys, and time spent on other purely administrative tasks. I also deleted all time billed by attorneys and staff who contributed only minimal time to prosecuting the action.

17. Accounting for these deletions, Turke & Strauss attorneys and staff have dedicated 1,023.6 hours prosecuting the case. At the hourly rates we charge for similar cases, Turke & Strauss has a lodestar of \$460,245.00. Turke & Strauss anticipates it will expend additional hours seeing this case through to final resolution, including supervising the distribution of payments to Settlement Class Members, responding to questions from Settlement Class Members, and other actions necessary to support the Settlement. Turke & Strauss will also expend time working on any appeals filed in this case.

18. The following table identifies the attorneys and staff members from Turke & Strauss who worked on this case, a general description of the work performed, the hourly rate charged for each individual, the number of hours worked by individual, the amount of fees for each individual, and the total hours and fees for the firm.

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
ATTORNEYS				
Samuel J. Strauss Partner at Turke & Strauss J.D. from Univ. of Washington School of Law, 2013	Worked on initial background investigation; analyzed various legal and factual issues; worked on pleadings; communications with class representatives and class members; attended meetings and conferences with counsel; attended hearings; worked on discovery matters; worked on case strategy; prepared for mediation; worked on settlement issues; worked on objector issues.	\$550	343.3	\$188,815
Mary C. Turke Partner at Turke & Strauss J.D. from Univ. of Wisconsin Law School, 1996	Worked on pleadings and memoranda; analyzed various legal and factual issues; worked on discovery matters; worked on case strategy; worked on mediation statement; attended hearings; worked on final approval briefing and supporting papers; worked on objector issues.	\$650	226.5	\$147,225
Jonathan Sopha Attorney at Turke & Strauss since January 2020 J.D. from Univ. of Wisconsin Law School, 2001	Analyzed and reviewed documents produced by third parties.	\$500	33.5	\$16,750
Alex Phillips Associate at Turke & Strauss since September 2018 J.D. from Univ. of Wisconsin Law School, 2017	Worked on pleadings, memoranda, and correspondence; analyzed various legal and factual issues; worked on mediation statement; attended meetings and conferences with counsel; attended hearings.	\$350	94.5	\$33,075
Zog Begolli Associate at Turke & Strauss since November 2017 J.D. from Univ. of Wisconsin Law School, 2017	Worked on initial background investigation and research; worked on factual investigation relating to class representatives; analyzed consumer complaints; communications with class representatives and class members; reviewed documents produced by third parties.	\$350	91.7	\$32,095

NAME AND POSITION	DESCRIPTION OF WORK PERFORMED	RATE	HOURS BILLED	TOTAL
Austin Doan Associate at Turke & Strauss since January 2020 J.D. from Univ. of Wisconsin Law School, 2017	Worked on pleadings and memoranda; analyzed various legal and factual issues; worked on responsive discovery; worked on objector issues.	\$350	32.1	\$11,235
PARALEGALS/LEGAL ASSISTANTS				
Rachel Pollack Paralegal at Turke & Strauss since January 2018 University of Washington, 2005	Worked on pleadings and memoranda; worked on discovery; worked on third-party discovery; worked on document production.	\$225	10.0	\$2,250
Rudis Requeno Legal Assistant at Turke & Strauss since 2021 University of Texas-Austin, 2016	Worked on document review of documents produced by third parties; worked on factual investigation.	\$150	83.0	\$12,450
Mike Roberts Legal Assistant at Turke & Strauss from June 2020 to May 2021 University of Wisconsin, 2014	Reviewed and analyzed documents produced by third parties.	\$150	94.3	\$14,145
Jesse Kelaidis Legal Assistant at Turke & Strauss since September 2018 Hendrix College, 2015	Worked on factual investigation; worked on discovery.	\$150	14.7	\$2,205
TOTAL:				\$460,245

19. Turke & Strauss sets the hourly rates for attorneys and staff members based on a variety of factors, including among others: the experience, skill, and sophistication required for the types of legal services typically performed; the rates customarily charged in the markets

where the legal services are performed; and the experience, reputation, and ability of the attorneys and staff members.

20. Our lodestar calculations are based on reasonable hourly rates. Indeed, courts have approved fee requests by Turke & Strauss that were based on similar rates to those requested here. A sample of the recent federal courts that have approved Turke & Strauss' billing rates and reimbursement of costs as reasonable are:

- a. May 2021, in *Jones, et al. v. Monsanto Company*, 19-0102-CV-W-BP (W.D. Mo.);
- b. August 2020, in *In re: Railway Industry Employee No-Poach Antitrust Litigation*, 18-798 (W.D. Pa.); and
- c. January 2019, in *Fowler, et al. v. Wells Fargo Bank, N.A.*, 17-cv-02092-HSG (N.D. Cal.).

21. Turke & Strauss has spent time on this litigation that could have been spent on other matters. At various times during the litigation of this class action, as well as during the litigation of the Minnesota action, a substantial percentage of my time has been consumed by these cases that otherwise could have been spent on other fee-generating work for existing clients, including matters billed on an hourly basis. In addition to a substantial percentage of my time, this case has required significant work by the firm's associates, paralegal, and support staff.

22. The time that Turke & Strauss has spent on this case has been completely contingent on the outcome of the action. Turke & Strauss has not been paid for any of the time spent on this litigation.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED at Madison, Wisconsin, this 1st day of June, 2021.

/s/ Samuel J. Strauss, Admitted Pro Hac Vice
Samuel J. Strauss, *Admitted Pro Hac Vice*