

5. This case required the efforts of multiple attorneys from Stris & Maher. I supervised the review of fee and expense records to support this Declaration and ensure its accuracy.

6. Our qualifications are summarized in my previous declaration (ECF 158-5) and our work on this case is discussed in the Declaration of Michelle C. Yau (filed herewith). Our work required the efforts of numerous attorneys and professional staff (“Timekeepers”) from Stris & Maher. I supervised all of the work of Stris & Maher Timekeepers in this case, and we carefully reviewed the fee and expense records that support this Declaration in order to ensure their accuracy. Based on my guidance, we eliminated or reduced several time entries based on our billing judgment. The below table reflects the lodestar expended by each Stris & Maher Timekeeper through December 6, 2024. I believe that the hours billed by the following Timekeepers are for the type of work that would normally be charged to a fee-paying client.

Name	Title	Hours	Rate	Lodestar
Peter Stris	Founding Partner	133.1	\$1,250	\$166,375.00
Elizabeth Brannen	Managing Partner	130.4	\$1,100	\$143,440.00
Tillman Breckenridge	Partner	8.7	\$1,050	\$9,135.00
Shaun Martin	Counsel	727.0	\$1,050	\$763,350.00
Matthew Seligman	Partner	26.4	\$950	\$25,080.00
Radha Pathak	Partner	441.0	\$925	\$407,925.00
Victor O'Connell	Partner	18.7	\$875	\$15,427.50
John Stokes	Partner	163.6	\$875	\$143,150.00
Tanya Tice	Discovery Associate	62.9	\$480	\$30,192.00
Andrea Akinola	Litigation Fellow	49.5	\$325	\$16,087.50
Total		<u>1761.3</u>		<u>\$1,721,097.00</u>

7. As reflected in the above summary, Stris & Maher attorneys have expended 1761.3 hours and \$1,721,097 in lodestar pursuing this matter through December 16, 2024. The hourly rates for the Timekeepers listed above are their standard 2024 rates. Our firm’s hourly rates are largely based upon a combination of the expertise and the years of experience for each attorney, as well as market rates for practitioners in their fields. These hourly rates are the same as the rates

Stris & Maher charges clients who pay hourly billing rates to the firm, and the firm regularly receives these hourly rates as compensation for legal work Stris & Maher provides.

8. In my professional opinion and based on my personal knowledge of the work that was performed and the requirements of this case and similar cases, the lodestar expended on this litigation by Stris & Maher Timekeepers was reasonable and necessary.¹

9. Class Counsel will continue to incur time and lodestar in responding to any Class Member inquiries or objections, preparing for and participating in the Final Approval Hearing, and otherwise effectuating the Settlement.

10. Before representing the named Plaintiffs in this action, neither I nor my firm had any prior relationship with any of them. We do not represent them, and have not represented them, in any other matters.

11. As illustrated by the table above, which shows that Stris invested 1761.3 hours of work and \$1,721,097 of lodestar in this action, this substantial investment of time prevented me and others on my team from working on other matters.

12. After the date of this Declaration, we expect to perform additional work on behalf of the Class, such as preparing final approval papers to be filed in this action.

13. The below table summarizes the amount of expenses advanced by Stris & Maher. Our firm contemporaneously documented these expenses in its books and records. I believe that the expenses set forth in the below table are the type and amount that would normally be charged to a fee-paying client. Our firm also contributed to the expense account discussed in the Declaration of Michelle C. Yau (filed herewith).

¹ Details supporting the time records referenced in this Declaration are available upon the request of the Court.

Description	Value
Court Filing Fees	\$750.00
Total	\$750.00

14. In my professional opinion, and based on my experience prosecuting this litigation and similar ERISA class action litigation, these expenses were reasonable and necessarily incurred in connection with this case.

15. All of the work that has been performed has been undertaken on a contingent basis. To date, Class Counsel have not been compensated for any of these expenses or for any of the time and effort expended on this case.

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

Executed this 16th day of December, 2024 in Cerritos, California.

/s/ Peter Stris
Peter Stris