

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LESLIE URLAUB, MARK PELLEGRINI, and MARK FERRY, on behalf of themselves and all others similarly situated,)	
)	
Plaintiffs,)	Case No. 21-cv-4133
)	
v.)	
)	
CITGO PETROLEUM CORPORATION, et al.,)	
)	
Defendants.)	
)	

**DECLARATION OF NINA WASOW IN SUPPORT OF PLAINTIFFS’ MOTION FOR
ATTORNEYS’ FEES, LITIGATION AND SETTLEMENT ADMINISTRATION
EXPENSES, AND SERVICE AWARDS**

I, Nina Wasow, respectfully submit this Declaration in Support of Plaintiffs’ Motion for Attorneys’ Fees, Litigation and Settlement Administration Expenses, and Service Awards. Pursuant to 28 U.S.C. § 1746, I declare as follows:

1. I am a member in good standing of the State Bar of California, admitted to practice before this Court, and a partner in Feinberg, Jackson, Worthman & Wasow LLP (FJWW), one of the counsel approved by the Court as Class Counsel.
2. All the facts stated herein are true and correct within my personal knowledge, and if called as a witness, I could and would testify competently to the facts stated herein.
3. I have litigated several class action ERISA cases similar to this one. Based on that experience, I believe strongly that this Settlement is fair and reasonable and should be approved.
4. If the case had not settled, Class Counsel was prepared to proceed to trial.
5. This case required the efforts of several attorneys from FJWW. I supervised the

review of fee and expense records to support this Declaration and ensure its accuracy.

6. The below table reflects the lodestar expended by each attorney at FJWW from the inception of the case until December 4, 2024.

First Name	Last Name	Title	Hour	Rate	Lodestar
Dan	Feinberg	Partner	0.2	1,125.00	\$225.00
Todd	Jackson	Partner	224.9	1,125.00	\$253,012.50
Nina	Wasow	Partner	150.3	1,025.00	\$154,057.50
<u>375.4</u>					<u>\$407,295</u>

7. As reflected in the above summary, FJWW attorneys have expended 375.4 hours and \$407,295 in lodestar pursuing this matter through December 4, 2024. After review of all time entries, some were removed based on billing judgment.

8. The hourly rates for the attorneys listed above are their standard rates. Our firm's hourly rates are largely based upon a combination of the title, cost to the firm, and the specific years of experience for each attorney, as well as market rates for practitioners in the field. These hourly rates are the same as or comparable to rates we have charged hourly clients and rates submitted by FJWW in other ERISA cases and approved by courts.

9. Courts have reviewed the reasonableness of FJWW's billing rates for purposes of "cross-checking" lodestar against a proposed fee based on the percentage of the fund method, as well as determining a reasonable fee under the lodestar method. Courts have found that the hourly rates used to calculate FJWW's lodestar were reasonable given our experience. *See, e.g., Sosa v. Marriott Int'l, Inc.*, No. 18CV335342 (Santa Clara Cty. Super. Ct. June 25, 2021); *Baird v. BlackRock Inst. Tr. Co.*, 2021 WL 5113030, at *7 (N.D. Cal. Nov. 3, 2021).

10. 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 FJWW's attorneys and paralegals was reasonable and necessary.

11. 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.

12. 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.

13. As illustrated by the table above, which shows that FJWW invested over 375 hours of work and over \$400,000 of lodestar in this action, this substantial investment of time prevented me and others on my team from working on other matters.

14. The below table summarizes the amount of expenses advanced by FJWW (grouped by category), in addition to the expenses that we contributed toward the litigation fund discussed in Ms. Yau's declaration. 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.

Description	Value
Travel (airfare, ground travel, meals, lodging)	\$1,386.52
Court filing fees	\$300
Total	\$1,686.52

15. 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.

16. 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.

17. I declare under penalty of perjury under the laws of the United States of America

that the foregoing is true and correct.

Executed this 13th day of December, 2024 in Berkeley, California.

/s/ Nina Wasow
Nina Wasow