

EXHIBIT A-1

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

JAN HARRISON; LEE RANALLI;
MORGAN TANNER; SPENCER
HATHAWAY; TODD TURLEY; DEBBIE
HALE; KELI ANNO; JOHN ZULLO;
CHRISTOPHER KUON-TSEN LEE; JIM
BUCKINGHAM; TANDA SAXTON;
JOHN WOZNAK; JEROME SHERMAN;
BEVERLY JENKINS; DAVID
PETERSEN; TOM STEVER; BRIAN
BAWOL; RANSOME FOOSE; and,
STACY FRANKLIN.

Plaintiffs,

v.

E.I. DUPONT DE NEMOURS AND
COMPANY; HUNTSMAN
INTERNATIONAL, LLC; KRONOS
WORLDWIDE, INC.; and, MILLENNIUM
INORGANIC CHEMICALS, INC.;

Defendants.

Case No. 5:13-cv-01180-BLF

**DECLARATION OF DON BARRETT IN
SUPPORT OF MOTION FOR
ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES,
AND SERVICE AWARDS**

Date: August 16, 2018

Time: 1:30 p.m.

Dept: Courtroom 3, 5th Floor

Judge: Honorable Beth Labson Freeman

1 I, Don Barrett, hereby declare as follows:

2 1. I am a partner in the law firm of Barrett Law Group, P.A. This Declaration
3 is provided in support of Plaintiffs' Motion for Award of Attorneys' Fees,
4 Reimbursement of Expenses, and Service Awards. I make this Declaration of my own
5 personal knowledge, and if called to do so, I could testify competently to the matters stated
6 herein.

7 2. On October 18, 2013, the Court granted Plaintiffs' motion to appoint myself
8 and of Barrett Law Group, P.A. as Interim Co-Lead Class Counsel and Ben F. Pierce Gore
9 as Liaison Counsel. This Court further designated CGL and Barrett Law Group as Class
10 Counsel when it granted preliminary approval of the Settlement on December 13, 2017.

11 3. Class Counsel have extensive experience representing consumers and other
12 plaintiffs in class actions and antitrust litigation. For a summary of Class Counsel's
13 qualifications, I refer the Court to Plaintiffs' previously filed Motion to Appoint Interim
14 Lead Counsel and the Motion for Preliminary Approval. Dkts. 49, 215.

15 4. From the inception of this litigation through May 15, 2018, Barrett Law
16 Group has expended 309.00 hours of work in connection with this litigation. Based
17 upon our customary rates in this type of litigation, the lodestar value of that time is
18 \$213,055.00.

19 5. Barrett Law Group's work on this case was performed on a wholly
20 contingent basis. Barrett Law Group has not received any amounts in connection with
21 this case.

22 6. Shown below is a true and correct summary identifying the attorneys,
23 paralegals, and other staff who have worked on this litigation, the number of hours those
24 individuals worked, their regular hourly billing rates, and their respective lodestar values.

25 7. The hourly rates shown below are the usual and customary rates charged in
26 this District for each individual doing the type of work performed on this litigation. These
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1 rates are not adjusted, notwithstanding the complexity of this litigation, the skill and
 2 tenacity of the opposition, the preclusion of other employment, the delay in payment, or
 3 any other factors that could be used to justify a higher hourly compensation.
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5	NAME	TITLE	HOURS	RATE	LODESTAR
6	Don Barrett (P)	Partner	209.70	\$ 825.00	\$173,002.50
7	Katherine Barrett Riley (P)	Partner	39.00	\$ 475.00	\$18,525.00
8	Richard Barrett (P)	Partner	2.50	\$ 475.00	\$1,187.50
9	Sterling Starns (P)	Partner	18.00	\$ 475.00	\$8,550.00
	Cary Littlejohn (A)	Associate	38.80	\$ 300.00	\$11,640.00
	Carolyn Mirick (PL)	Paralegal	1.00	\$ 150.00	\$150.00
	TOTALS		309.00		\$213,055.00

10 8. These amounts were derived from daily time records Barrett Law Firm
 11 compiled on this matter, which are recorded in our computerized database.

12 9. Barrett Law Firm has advanced a total of \$48,775.17 in expenses reasonably
 13 and necessarily incurred in connection with the prosecution of this litigation. They are
 14 broken down as follows:

16	DESCRIPTION	AMOUNT
17	Federal Express, Local Courier, etc.	\$69.44
18	Postage Charges	\$2.13
19	Long Distance	\$20.84
20	Travel (transportation, lodging, meals, etc.)	\$4,374.64
21	Court Fees (filing, etc.)	\$933.00
22	Professional Fees (expert/investigators, etc.)	\$42,888.65
23	Computer Research	\$486.47
24	TOTAL	\$48,775.17

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 DECLARATION OF DON BARRETT IN SUPPORT OF MOTION FOR
 ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES,
 AND SERVICE AWARDS
 Case No. 13-cv-01180 (BLF)

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10. These expenses are reflected in the books and records regularly kept and maintained by Barrett Law Group. All expenses paid to experts were dispensed by Barrett Law Group from a separately maintained account, which was funded by assessments from co-counsel in this matter.

11. The lodestar summary reflects Barrett Law Group’s role as Class Counsel and experience in the field, the complexity of the matters involved in this litigation, and the prevailing rate for providing such services.

12. In my opinion, the time expended and expenses incurred in prosecuting this action were reasonable and necessary for the diligent litigation of the matter

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and was executed in Lexington, Mississippi on May 24, 2018.

s/ Don Barrett

Don Barrett