

# **EXHIBIT A-2**

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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 PIERCE GORE 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, Pierce Gore, hereby declare as follows:

2 1. I am Of Counsel in the law firm of Pratt & Associates (“Pratt”). I was  
3 appointed Liaison Counsel on October 13, 2013, and I represent Jan Harrison, who was  
4 appointed Class Representative by this Court on December 13, 2017. This Declaration is  
5 provided in support of Plaintiffs’ Motion for Award of Attorneys’ Fees,  
6 Reimbursement of Expenses, and Service Awards. I make this Declaration of my own  
7 personal knowledge, and if called to do so, I could testify competently to the matters stated  
8 herein.

9 2. From the inception of this litigation through May 23, 2018, Pratt has  
10 expended 163.50 hours of work in connection with this litigation. Based upon our  
11 customary rates in this type of litigation, the lodestar value of that time is \$128,555.00.

12 3. Pratt’s work on this case was performed on a wholly contingent basis. Pratt  
13 has not received any amounts in connection with this case.

14 4. Shown below is a true and correct summary identifying the attorney who  
15 worked on this litigation, the number of hours the attorney worked, his regular hourly  
16 billing rates, and his respective lodestar values.

17 5. The hourly rates shown below are the usual and customary rates charged in  
18 this District for each individual doing the type of work performed on this litigation. These  
19 rates are not adjusted, notwithstanding the complexity of this litigation, the skill and  
20 tenacity of the opposition, the preclusion of other employment, the delay in payment, or  
21 any other factors that could be used to justify a higher hourly compensation.

22	23	24	25	26	27
NAME	TITLE	HOURS	RATE	LODESTAR	
Pierce Gore	Attorney	163.50	\$850.00	\$128,555.00	

28 6. These amounts were derived from daily time records Pratt compiled on this  
matter, which are recorded in our computerized database.

7. Pratt has not advanced any expenses in this litigation.

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8. The lodestar summary reflects Pratt’s experience in the field, the complexity of the matters involved in this litigation, and the prevailing rate for providing such services.

9. 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 Corte Madera on May 23, 2018.

*s/ Pierce Gore*  
\_\_\_\_\_  
Pierce Gore