

EXHIBIT A-3

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**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 DEWITT M.
LOVELACE 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, Dewitt M. Lovelace, hereby declare as follows:

2 1. I am a partner in the law firm of Lovelace and Associates, P.A., and I
3 represent Todd Turley, who was appointed Class Representative by this Court on
4 December 13, 2017. This Declaration is provided in support of Plaintiffs' Motion for
5 Award of Attorneys' Fees, Reimbursement of Expenses, and Service Awards. I make
6 this Declaration of my own personal knowledge, and if called to do so, I could testify
7 competently to the matters stated herein.

8 2. From the inception of this litigation through April 2018, Lovelace and
9 Associates, P.A., has expended 255.60 hours of work in connection with this litigation.
10 Based upon our customary rates in this type of litigation, the lodestar value of that time
11 is \$82,930.00.

12 3. Lovelace and Associates, P.A.'s work on this case was performed on a
13 wholly contingent basis. Lovelace and Associates, P.A., has not received any amounts in
14 connection with this case.

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

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

NAME	TITLE	HOURS	RATE	LODESTAR
Dewitt M. Lovelace	Partner	46.10	\$700	\$32,270.00
Gary Yarborough	Attorney	14.20	\$575	\$8,165.00
Valerie Lauro	Attorney	22.90	\$350	\$8,015.00
Sandy Rosenthal	Paralegal	172.40	\$200	\$34,480.00
TOTALS		255.60		\$82,930.00

23
24
25
26
27
28
DECLARATION OF DEWITT M. LOVELACE IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES,
AND SERVICE AWARDS
Case No. 13-cv-01180 (BLF)

