

EXHIBIT A-4

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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 WOZNIAK; 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 GERARD V.
MANTESE 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, Gerard V. Mantese, hereby declare as follows:

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

8 2. From the inception of this litigation through June 15, 2017, Mantese
9 Honigman, PC has expended 74.80 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 \$50,606.00.

12 3. Mantese Honigman PC's work on this case was performed on a wholly
13 contingent basis. Mantese Honigman, PC has not received any amounts in connection
14 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
Gerard Mantese	Partner	17.50	\$775	\$13,562.50
David Honigman	Partner	31.00	\$775	\$24,025.00
Brendan Frey	Associate	25.30	\$495	\$12,523.50
David Hansma	Associate	1.00	\$495	\$495.00
TOTALS		74.80		\$50,606.00

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

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

7. Mantese Honigman, PC has advanced a total of \$90.15 in expenses reasonably and necessarily incurred in connection with the prosecution of this litigation. They are broken down as follows:


<i>EXPENSE CATEGORY</i>	<i>AMOUNT</i>
In-House Photocopying	\$84.90
Computer Research	\$5.25
TOTAL:	\$90.15

8. These expenses are reflected in the books and records regularly kept and maintained by Mantese Honigman, PC.

9. The lodestar summary reflects Mantese Honigman, PC's experience in the field, the complexity of the matters involved in this litigation, and the prevailing rate for providing such services.

10. 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 Troy on May 23, 2018.


s/ Gerard V. Mantese