

# **EXHIBIT A-5**

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 SHAWN M.  
RAITER IN SUPPORT OF MOTION  
FOR ATTORNEYS' FEES,  
REIMBURSEMENT OF EXPENSES,  
AND SERVICE AWARDS**

Date: August 16, 2018

Time: 1:39 p.m.

Dept: Courtroom 3, 5th Floor

Judge: Honorable Beth Labson Freeman

1 I, SHAWN M. RAITER, hereby declare as follows:

2 1. I am a partner in the law firm of Larson • King, LLP, and I represent Jim  
3 Buckingham, who was appointed Class Representative by this Court on December 13,  
4 2017. This Declaration is provided in support of Plaintiffs' Motion for Award of  
5 Attorneys' Fees, Reimbursement of Expenses, and Service Awards. I make this  
6 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 30, 2018, Larson •  
9 King, LLP has expended 75.40 hours of work in connection with this litigation. Based  
10 upon our customary rates in this type of litigation, the lodestar value of that time is  
11 \$28,021.50.

12 3. Larson • King's work on this case was performed on a wholly contingent  
13 basis. Larson • King has not received any amounts in connection with this case.

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

| NAME                    | TITLE     | HOURS        | RATE     | LODESTAR           |
|-------------------------|-----------|--------------|----------|--------------------|
| Shawn M. Raiter         | Partner   | 15.70        | \$650.00 | \$10,205.00        |
| Patrick H. O'Neill, Jr. | Partner   | 2.90         | \$545.00 | \$1,580.50         |
| Paul A. Sand            | Associate | 29.00        | \$325.00 | \$9,425.00         |
| Jennifer L. Young       | Associate | 12.60        | \$245.00 | \$3,087.00         |
| Andrew Hart             | Associate | 15.20        | \$245.00 | \$3,724.00         |
| <b>TOTALS</b>           |           | <b>75.40</b> |          | <b>\$28,021.50</b> |

22  
23  
24  
25  
26  
27  
28  
DECLARATION OF SHAWN M. RAITER IN SUPPORT OF MOTION FOR  
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES,  
AND SERVICE AWARDS  
Case No. 13-cv-01180 (BLF)

