

EXHIBIT A-6

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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 THOMAS P.
THRASH 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, Thomas P. Thrash, hereby declare as follows:

2 1. I am a partner in the law firm of Thrash Law Firm, P.A., and I represent
3 Morgan Tanner and Stacy Franklin, who were appointed Class Representatives by this
4 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 December 31, 2017, Thrash
9 Law Firm, P.A. has expended 277.15 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 \$205,377.50.

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

15 4. Shown below is a true and correct summary identifying the attorneys who
16 have worked on this litigation, the number of hours those individuals worked, their regular
17 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.

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NAME	TITLE	HOURS	RATE	LODESTAR
Thomas P. Thrash	Partner	168.20	\$800.00	\$134,560.00
Marcus N. Bozeman	Associate	108.95	\$650.00	\$70,817.50
TOTALS		277.15		\$205,377.50

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DECLARATION OF THOMAS P. THRASH 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 Thrash Law Firm, P.A. compiled on this matter, which are recorded in our computerized database.

7. Thrash Law Firm, P.A. has advanced a total of \$547.30 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	\$117.40
Travel (Transportation, Lodging, Meals, etc.)	\$104.40
Court Fees (Filing, etc.)	\$305.00
Computer Research	\$20.50
TOTAL:	\$547.30

8. These expenses are reflected in the books and records regularly kept and maintained by Thrash Law Firm, P.A.

9. The lodestar summary reflects Thrash Law Firm, P.A.’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 Little Rock, Arkansas on May 23, 2018.

/s/ Thomas P. Thrash
THOMAS P. THRASH