

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN SULLIVAN, WHITE OAK FUND LP,  
CALIFORNIA STATE TEACHERS' RETIREMENT  
SYSTEM, SONTERRA CAPITAL MASTER FUND,  
LTD., FRONTPOINT PARTNERS TRADING  
FUND, L.P., AND FRONTPOINT AUSTRALIAN  
OPPORTUNITIES TRUST on behalf of themselves  
and all others similarly situated,

Plaintiffs,

*- against -*

BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS  
CAPITAL INC., BNP PARIBAS S.A., CITIGROUP,  
INC., CITIBANK, N.A., COÖPERATIEVE  
CENTRALE RAIFFEISEN-BOERENLEENBANK  
B.A., CRÉDIT AGRICOLE S.A., CRÉDIT AGRICOLE  
CIB, DEUTSCHE BANK AG, DB GROUP SERVICES  
UK LIMITED, HSBC HOLDINGS PLC, HSBC BANK  
PLC, ICAP PLC, ICAP EUROPE LIMITED, J.P.  
MORGAN CHASE & CO., JPMORGAN CHASE  
BANK, N.A., THE ROYAL BANK OF SCOTLAND  
PLC, SOCIÉTÉ GÉNÉRALE SA, UBS AG AND JOHN  
DOE NOS. 1-50,

Defendants.

Docket No. 13-cv-02811 (PKC)

**DECLARATION OF DAVID E. KOVEL IN SUPPORT OF  
CLASS COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND  
REIMBURSEMENT OF EXPENSES**

I, David E. Kovel, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a partner with the law firm of Kirby McInerney LLP (“Kirby McInerney”).

The statements herein are true to the best of my personal knowledge, information and belief based on the books and records of Kirby McInerney and information received from its attorneys and staff.

2. Kirby McInerney serves as additional Plaintiffs’ counsel for the putative class in the above-captioned action.

3. I respectfully submit this declaration in support of Class Counsel’s Motion for Award of Attorneys’ Fees and Reimbursement of Expenses and seek attorneys’ fees and reimbursement of expenses in this Action.

4. During the course of this litigation, and as detailed herein, Kirby McInerney worked on assignments that it was specifically directed to perform by Class Counsel, Lowey Dannenberg, P.C. and Lovell Stewart Halebian Jacobson LLP.

5. Set forth below are Kirby McInerney’s legal services rendered in this litigation, the lodestar value of those services and the expenses reasonably incurred by the firm in connection with this litigation for which reimbursement is requested.

6. Among the services Kirby McInerney performed on behalf of the putative class in connection with the prosecution of the litigation include, but are not limited to, the following: drafting pleadings and motion papers, legal research, discovery and document review (including French language document analysis), settlement related tasks including allocation mediation, and other general assignments given by Class Counsel.

7. The schedule in ¶ 8 below is a summary reflecting the amount of time spent by the attorneys and professional support staff of Kirby McInerney involved in this litigation, and the lodestar calculations based on the firm’s current hourly billing rates. The schedule was prepared based upon daily time records maintained by attorneys and professional support staff at Kirby

McInerney. The schedule in ¶ 11 below reflects the expenses incurred by the firm in its representation of the putative class in this litigation thus far. The hourly billing rate for any timekeeper primarily involved in first-level document review has been capped at \$350/hour, and the charges for timekeepers with less than 15 hours billed in this Action have been excluded, except for charges related to work as allocation counsel.

8. From the inception of this litigation through February 28, 2018, Kirby McInerney's total fee compensable time for which it seeks an award of attorneys' fees is summarized below.

<b>Timekeeper</b>	<b>Role</b>	<b>Rates</b>	<b>Hours</b>	<b>Charges</b>
David Kovel	Partner	\$985	160.00	\$157,600.00
Karen Lerner	Partner	\$900	296.75	\$267,075.00
Thomas Elrod	Partner	\$700	58.25	\$40,775.00
Lauren Wagner-Pederson	Of Counsel	\$750	161.25	\$120,937.50
Seth Shapiro	Associate	\$400	18.25	\$7,300.00
Parul Sharma	Staff Attorney	\$350	653.00	\$228,550.00
Miriam Bial	Paralegal	\$250	9.50	\$2,375.00
<b>TOTALS</b>			1,357.00	\$824,612.50

9. Thus, the total time for which my firm is requesting an award of legal fees is 1,357.00 hours. The total lodestar value of these professional services is \$824,612.50. The time reported for former employees was recorded prior to their departures and reflects their final billing rates.

10. The above hourly rates for Kirby McInerney's attorneys and professional support staff are the firm's current hourly rates. The firm's lodestar figures do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in the firm's current billing rates. Further, expense items do not contain any general overhead costs and do not contain a surcharge over the amount paid to the corresponding vendor(s).

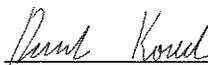
11. As detailed and categorized in the below schedule, Kirby McInerney has incurred a total of \$2,001.50 in expenses for which it is currently requesting reimbursement.

<b>Expense Categories</b>	<b>Cumulative Expenses</b>
Travel - Airfare, Lodging, Meals, Taxi	\$876.31
Computer Research, Databases & Docket	\$890.55
Acquisition of Court Transcripts/Court Reporter Fees	\$234.64
<b>TOTAL</b>	<b>\$2,001.50</b>

12. The above schedule was prepared based upon expense records reflected in the books and records of Kirby McInerney. These books and records are prepared from expense vouchers, check records, receipts and other source materials.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 23, 2018



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David E. Kovel