

**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 LINDA NUSSBAUM IN SUPPORT OF
CLASS COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES**

I, Linda Nussbaum, pursuant to 28 U.S.C. §1746, hereby declares as follows:

1. I am a Director with the law firm of Nussbaum Law Group, P.C. ("NLG"). The statements herein are true to the best of my personal knowledge, information and belief based on the books and records of NLG and information received from its attorneys and staff.
2. NLG 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 for services performed on behalf of the Class by my firm in this Action.
4. During the course of this litigation, and as detailed herein, NLG 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 NLG's legal services rendered in this litigation, the current 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 NLG performed on behalf of the putative class in connection with the prosecution of the litigation include, but are not limited to, the following: assistance in general research regarding claims, defenses, and discovery matters; review and analysis of documents produced by defendants JPMorgan, HSBC, Deutsche Bank, and memos to Class Counsel with respect to those documents; review and analysis of client data; and edits to pleadings.
7. The schedule in ¶ 8 below is a summary reflecting the amount of time spent by the attorneys and professional support staff of NLG 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 NLG. 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.

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

| Attorneys | Role ¹ | Rates | Hours | Charges |
|----------------|-------------------|-------|-------|--------------|
| Linda Nussbaum | P | \$995 | 15.7 | \$15,621.50 |
| Peter Moran | A | \$350 | 39.8 | \$13,930.00 |
| Joshua Alpert | CL | \$350 | 194.0 | \$67,900.00 |
| Ivan Dodeles | CL | \$350 | 31.5 | \$11,025.00 |
| | | | | |
| TOTALS | | | 281.0 | \$108,476.50 |

9. Thus, the total time for which my firm is requesting an award of legal fees is 281.0 hours. The total lodestar value of these professional services is \$108,476.50

10. The above hourly rates for NLG'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, NLG has incurred a total of \$370.46 in expenses for which it is currently requesting reimbursement.

| Expense Categories | Cumulative Expenses |
|----------------------------------|---------------------|
| Computer Research, Databases | \$288.71 |
| Conferences, Meetings, Telephone | \$28.00 |
| In-House Copying | \$53.75 |
| TOTAL | \$370.46 |

¹ "P" refers to Partners. "A" refers to Associates. "CL" refers to Contract Lawyers.

12. The above schedule was prepared based upon expense records reflected in the books and records of NLG. 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

