

**IN THE CIRCUIT COURT OF  
MARYLAND FOR  
ANNE ARUNDEL COUNTY**

Abigail Collins, Taylor Breshanan, Caitlyn Creasy, and Vincent Pacheco, individually and on behalf of all others similarly situated,  Plaintiffs,  Washington College,  Defendant.	Case No. C-02-CV-24-001728
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**JOINT DECLARATION OF PLAINTIFFS' COUNSEL IN SUPPORT OF PLAINTIFFS'  
MOTION FOR ATTORNEYS' FEES, EXPENSES, AND SERVICE AWARDS**

1. We are counsel for Plaintiffs in the above-captioned case. We have personal knowledge of the facts in this declaration and could testify to them if called on to do so.

2. Class Counsel have substantial experience in class actions and data breach actions of similar size, scope, and complexity; and believe this settlement represents a fair resolution of this matter and is in the best interests of the Plaintiffs and the Settlement Class.

**THE CONTINGENT NATURE OF THE CASE**

3. Our Firms prosecuted this case on a purely contingent basis. As such, Plaintiffs' Counsel assumed a significant risk of nonpayment or underpayment.

4. This matter has required us, and other attorneys at our Firms, to spend time on this litigation that could have been spent on other matters. At various times during the litigation of this class action, this lawsuit has consumed significant amounts of our time and our Firms' time.

5. Such time could otherwise have been spent on other fee-generating work. Because Plaintiffs' Counsel undertook representation of this matter on a contingency-fee basis, we

shouldered the risk of expending substantial costs and time in litigating the action without any monetary gain in the event of an adverse judgment.

6. If not devoted to litigating this action, from which any remuneration is wholly contingent on a successful outcome, the time Plaintiffs' Counsel spent working on this case could and would have been spent pursuing other potentially fee generating matters.

7. Litigation is inherently unpredictable and therefore risky. Here, that risk was very real, due to the rapidly evolving nature of case law pertaining to data breach litigation, and the state of data privacy law. Therefore, despite Plaintiffs' Counsel's devotion to the case and our confidence in the claims alleged against Defendant, there have been many factors beyond our control that posed significant risks.

#### **ATTORNEYS' FEES AND COSTS**

8. In the course of litigating this action, Class Counsel has recorded \$1,226.56 reasonable and necessary litigation expenses, including filing, service, pro hac vices motions, and court fees. In addition, Class Counsel reasonably anticipates incurring additional expenses as part of final approval and dealing with administration of the settlement.

9. In the course of litigating this action, Class Counsel has recorded a total lodestar among all firms combined of over \$144,853.90 over 188.50 hours of work at their normal hourly rates. In addition, Class Counsel expects that this lodestar will increase meaningfully for the time that must yet be expended: (1) briefing final approval; (2) arguing final approval; and (3) completing settlement administration and the claims process, including overseeing the settlement administrator.

10. Class Counsel has calculated that their total lodestar yields a modest multiplier of 1.24, which is well within the range accepted by courts. Also, the lodestar multiplier will ultimately

be much lower once final approval is sought as Class Counsel expect to spend additional time working with the Settlement Administrator on notice and claims administration and seeking final approval. The breakdown of time spent by each Class Counsel Firm is laid out below.

<u>Biller</u>	<u>Position</u>	<u>Hourly Rate</u>	<u>Time Spent</u>	<u>Lodestar</u>
<b>Milberg</b>				
David Lietz	Senior Partner	\$997/1057/1141	49.5	\$52,444.00
Zach Howerton	Associate	\$468	7.30	\$3,416.40
Dean Meyer	Associate	\$413	4.60	\$1,899.80
John Nelson	Associate	\$508	0.50	\$254.00
Tom Pacheco	Associate	\$538	0.20	\$119.50
Sandra Passanisi	Paralegal	\$225/239	5.40	\$1,269.50
Ashley Tyrell	Paralegal	\$208/239	2.60	\$581.10
Heather Sheflin	Paralegal	\$225/239	2.40	\$55.40
Amanda Simpson	Paralegal	\$239	1.00	\$239.00
Kerry Brennan	Paralegal	\$239	.50	\$119.50
		<b>Total:</b>	<b>74.10</b>	<b>\$60,886.40</b>
<b>Laukaitis</b>				
Kevin Laukaitis	Attorney	\$975	43.80	\$42,705.00
Daniel Tomascik	Law Clerk	\$325	5.6	\$1,820.00
Daniellys Suarez	Law Clerk	\$325	4.4	\$1430.00
		<b>Total:</b>	<b>53.80</b>	<b>\$45,955.00</b>

<b>Strauss Borrelli</b>				
Samuel Strauss	Partner	\$700.00	17.20	\$12,040.00
Raina Borrelli	Partner	\$700.00	28.70	\$20,090.00
Sarah Soleiman	Associate	\$400.00	7.70	\$3,080.00
Andrew Gunem	Associate	\$400.00	6.90	\$2,760.00
Zog Begolli	Associate	\$425.00	0.10	\$42.50
		<b>Total:</b>	<b>60.60</b>	<b>\$38,012.50</b>

11. In addition to Class Counsel, the named Plaintiffs were an integral part of achieving the Settlement. Without the Class Representatives, the thousands of other Class Members would not have received the benefits now available, and the Class Representative spent time and effort assisting with investigation of the case, providing counsel with documents, responding to counsel's many questions regarding Plaintiffs' experiences and expectations, reviewing and approving the Settlement Agreement, and otherwise participating in the litigation and settlement.

We affirm, under the penalties for perjury, that the foregoing representations are true.

Dated: February 7, 2025

Respectfully submitted,

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*\* Motion for Special Admission Granted*

*\*\*Motion for Special Admission Forthcoming*