



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE HANDY & HARMAN, LTD :  
STOCKHOLDERS LITIGATION : Consol. C.A. No. 2017-0882-TMR  
:

**AFFIDAVIT OF KURT M. HEYMAN, ESQ.**

STATE OF DELAWARE :  
: S.S.  
COUNTY OF NEW CASTLE :

Kurt M. Heyman, being duly sworn, deposes and states:

1. I am a member in good standing of the Bar of the Supreme Court of the State of Delaware and a partner with the law firm of Heyman Enerio Gattuso & Hirzel LLP (“HEGH”), which acts as co-lead counsel for plaintiff and the Class in the Action.<sup>1</sup> I submit this affidavit in support of Lead Plaintiff’s Brief in Support of Final Approval of Settlement and Petition for an Award of Attorneys’ Fees and Expenses.

2. Class Counsel, including HEGH, represented Plaintiff in this action on a fully contingent basis. HEGH attorneys dedicated 662.7 hours to the prosecution of the action from its commencement through July 9, 2019 (the date of the Stipulation). Between July 9, 2019 and October 22, 2019, HEGH attorneys devoted an additional 19.2 hours to the Settlement. The total lodestar amount for attorney time based on my firm’s rates that were applicable the date this matter began is

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<sup>1</sup> Defined terms have the same meaning as those used in the Brief.

\$338,371.5 through July 9, 2019 and \$347,350.50 in total. The hourly rates shown below are our standard rates for corporate litigation matters. A breakdown of the lodestar is as follows:

<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Lodestar</b>
Kurt M. Heyman (P)	199.4	\$795	\$158,523.00
Melissa N. Donimirski (A)	149.1	\$495	\$73,804.50
Aaron M. Nelson (A)	333.4	\$345	\$115,023.00
<b>Totals</b>	<b>681.9</b>		<b>\$347,350.50</b>

(P) = Partner (A) = Associate

3. My firm's individual expenses total \$121,783.59. Those expenses are broken down by category below:

<b>CATEGORY</b>	<b>TOTAL</b>
Court Costs	\$1,453.00
Transcripts	\$6,129.55
Travel/Travel Related	\$16,014.18
Filing Fees	\$7,822.25
Conference Calls	\$183.61
Electronic Database	\$693.75
Outside Copy	\$3,399.75
Courier/Messenger	\$387.64
Secretarial OT	\$64.91
Expert Bills	\$78,915.00
Svc of Process	\$626.20
Registered Agent Fees	\$389.50
Mediation Fees	\$5,704.25
<b>Total</b>	<b>\$121,783.59</b>

4. The expenses and charges pertaining to this case are reflected in the books and records of my firm. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

5. For the reasons stated in Lead Plaintiff's Brief in Support of Final Approval of Settlement and Petition for Award of Attorneys' Fees and Expenses, I believe that the settlement is fair and should be approved.

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

Executed this 23<sup>rd</sup> day of October, 2019.



Kurt M. Heyman (# 3054)  
HEYMAN ENERIO  
GATTUSO & HIRZEL LLP  
300 Delaware Avenue, Suite 200  
Wilmington, DE 19801  
(302) 472-7300

SWORN AND SUBSCRIBED before  
me this 23<sup>rd</sup> day of October, 2019.



Notary Public

**DENISE ANDREWS**  
**NOTARY PUBLIC**  
**STATE OF DELAWARE**  
My Commission Expires November 18, 2019