EFiled: Oct 23 2019 06:26PM EDT Transaction ID 64346852 Case No. 2017-0882-TMR

## IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE: HANDY & HARMAN, LTD STOCKHOLDER LITIGATION

Consol. C.A. No.: 2017-0882-TMR

## AFFIDAVIT OF TODD S. GARBER

STATE OF NEW YORK

S.S.

COUNTY OF WESTCHESTER

I, Todd S. Garber, declare under penalty of perjury as follows:

1. I am a partner with the law firm Finkelstein, Blankinship, Frei-Pearson & Garber, LLP ("FBFG"). I submit this declaration in support of Lead Plaintiff's motion for approval of the settlement and an award of attorneys' fees in connection with services rendered in the above-captioned action (the "Action"), as well as for reimbursement of expenses incurred in connection with the Action. I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

- 2. FBFG served as New York counsel for Class Counsel and the Class in the parallel litigation in New York captioned *In re: Handy & Harman, Ltd., Stockholder Litigation*, Index No. 654747/2017 (Sup. Ct., N.Y. Cnty.) (the "New York Action"). FBFG also provided assistance reviewing non-public documents produced by Defendants and other relevant third parties in this Action.
  - 3. FBFG's current resume is attached hereto as Exhibit A.

- 4. As New York counsel, FBFG, among other things, reviewed and commented on filings, facilitated filings in the New York Action, communicated with the court in the New York Action, and ensured that Lead Plaintiff's filings complied with local rules, customs, and practices in the New York Action. In addition, FBFG, as part of its joint prosecution of the Action, reviewed and analyzed documents produced in this Action.
- 5. The information in this Declaration regarding FBFG's time and expenses is taken from time and expense printouts prepared and maintained by FBFG in the ordinary course of business. I am the partner who oversaw and/or conducted the day-to-day activities in the litigation and reviewed these printouts (and backup documentation where necessary or appropriate). The purpose of these reviews was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. I believe that the time reflected in FBFG's lodestar calculation and the expenses for which payment is sought are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, the expenses are all of a type that are routinely paid by fee-paying clients in the private legal marketplace.
- 6. The total number of hours expended on the Action by FBFG from the Action's inception is 152.6. The total lodestar for FBFG is \$89,837.50. The hourly

rates for the attorneys and professional support staff in FBFG shown below are the reasonable and customary rates for each individual. A breakdown of the lodestar is as follows:

From Inception through July 10, 2019			
NAME	HOURS	RATE	LODESTAR
Todd S. Garber (P)	14.4	\$850	\$12,240.00
Antonino Romano (A)	102.5	\$575	\$58,937.50
John Sardesai-Grant (A)	29.2	\$550	\$16,060.00
Ayana McGuire (A)	6.5	\$400	\$2,600.00
TOTAL:	152.6		\$89,837.50

Partner (P), Associate (A)

- 7. FBFG's lodestar figures are based upon FBFG's current billing rates, which do not include charges for expense time. Expense items are billed separately, and such charges are not duplicated in FBFG's billing rates.
- 8. FBFG also incurred a total of \$271.46 in unreimbursed expenses in connection with the prosecution of the Action from its inception. Court fees and related research expenses totaled 242.68. Travel expenses totaled \$28.78. The expenses are all of a type that are routinely paid by fee-paying clients in the private legal marketplace.
- 9. The expenses pertaining to this case are reflected in the books and records of the FBFG. These books and records are prepared from receipts, expense vouchers, check records, and other documents and are an accurate record of the expenses. These records are available for the Court's in camera review upon request.

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

Executed this 22day of October, 2019.

Todd S. Garber

Sworn to and subscribed before me this 22 day of October 2019

Notary Public

My commission expires:  $\frac{9/(2/20)}{2}$ 

DEBORA SOLOMON
NOTARY PUBLIC-STATE OF NEW YORK
No. 01SO6347779
Qualified In Westchester County
My Commission Expires 09-12-2020