

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: RAILWAY INDUSTRY)	Master Docket Misc. No. 18-798
EMPLOYEE NO-POACH ANTITRUST)	
LITIGATION)	MDL No. 2850
)	
This Document Relates to:)	
ALL ACTIONS)	

**DECLARATION OF JOSHUA H. GRABAR IN SUPPORT OF
CLASS COUNSEL’S MOTION FOR ATTORNEY’S FEES, COSTS,
AND SERVICE AWARDS**

I, Joshua H. Grabar declare as follows:

1. I am Principal of the Grabar Law Office (the “Firm”). I submit this declaration in support of Class Counsel’s motion for attorneys’ fees, costs, and service awards. The time expended in preparing this declaration is not included in the motion for attorneys’ fees.

2. I, and the Grabar Law Office, have extensive experience as counsel in complex commercial class action litigation under state and federal antitrust laws, federal securities laws, and state consumer protection laws. I have focused my practice on class action litigation since 1998. In addition, I advise numerous publicly listed corporations, multinational manufacturers and distributors, municipalities, universities, business owners and individuals on matters concerning antitrust compliance, retention of antitrust claims and recoveries, and consumer protection law compliance issues.

3. I have reviewed the Court’s November 6, 2018 Order Appointing Interim Lead Class Counsel (Dkt. 106) (“Order”), including in particular the Order’s provisions regarding fees, costs, and expenses. The Firm has adhered to those provisions and to guidance received throughout the litigation from Class Counsel regarding timekeeping and expense reporting.

4. During the course of this litigation, the Firm has been involved in the following activities on behalf of the Settlement Class at the request and under the direction of interim lead class counsel (“Lead Counsel”):

- a. Factual and legal research in drafting the first filed putative class action complaint, *Carruth v. Knorr-Bremse AG et al.*, 2:18-cv-00469 (W.D. Pa.);
- b. Client communications;
- c. Drafting and review of stipulations with experts and communications with co-counsel regarding the same;
- d. Review and completion of Plaintiff questionnaires and Plaintiff-related memorandum.

5. Summary of Time and Expenses. During the course of this litigation, the Firm performed 5.5 hours of work in connection with this litigation to the benefit of the Settlement Class. Based upon the Firm’s current hourly rates, the lodestar value of the time is \$4,262.50. The chart below indicates the attorneys at my firm who worked on this litigation, the number of hours worked, and their respective lodestar values and hourly rates. This information was based on contemporaneous, daily time records regularly prepared and maintained by the Firm, as provided to, reviewed and approved by Lead Counsel.

Attorney	Hourly Rate	Total Hours	Lodestar
Joshua H. Grabar	\$775.00	5.5	\$4,262.50

6. All of the services performed by the Firm in connection with this litigation and described above were reasonably necessary in the prosecution of this case. There has been no

unnecessary duplication of services for which the Firm now seeks compensation. The lodestar calculations exclude time spent reading or reviewing work prepared by others or other information concerning this case unless related to preparation for, or work on, a matter specifically assigned to the Firm by Class Counsel. The rates at which the Firm seeks compensation are its usual and customary hourly rates charged for similar work.

7. This Firm has not received any compensation for the services rendered on behalf of the Class, and any such compensation is wholly contingent on the Court's approval of Class Counsel's motion for attorney's fees. My firm has devoted substantial time and resources to this matter, and for that reason has foregone other legal work for which it would have been compensated.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, and that this declaration was executed in Philadelphia, PA on April 30, 2020.

By: /s/ Joshua H. Grabar
Joshua H. Grabar