

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

In re RAILWAY INDUSTRY EMPLOYEE  
NO-POACH ANTITRUST LITIGATION

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This Document Relates To:

ALL ACTIONS.

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) Master Docket: Misc. No. 18-798

) MDL No. 2850

) DECLARATION OF ALEXANDRA S.  
) BERNAY FILED ON BEHALF OF  
) ROBBINS GELLER RUDMAN & DOWD  
) LLP IN SUPPORT OF CLASS COUNSEL'S  
) MOTION FOR ATTORNEYS' FEES,  
) COSTS AND SERVICE AWARDS

I, ALEXANDER S. BERNAY, declare as follows:

1. I am a member of Robbins Geller Rudman & Dowd LLP (“Robbins Geller” or the “Firm”). I submit this declaration in support of Class Counsel’s motion for attorneys’ fees, costs and charges (“costs”), and service awards. The time expended in preparing this declaration is not included in the motion for attorneys’ fees.

2. Robbins Geller is one of the world’s leading complex litigation firms representing plaintiffs in securities fraud, antitrust, corporate mergers and acquisitions, consumer and insurance fraud, multi-district litigation, and whistleblower protection cases. With 200 lawyers in 9 offices, Robbins Geller has obtained many of the largest securities, antitrust, and consumer class action recoveries in history, recovering tens of billions of dollars for victims of fraud and corporate wrongdoing. Robbins Geller attorneys are consistently recognized by courts, professional organizations and the media as leading lawyers in their fields of practice.

3. I have reviewed the Court’s November 6, 2018 Order Appointing Interim Co-Lead Class Counsel (ECF No. 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 retained clients and investigated potential class representatives for the benefit of the Settlement Class.

5. Summary of Time and Expenses. During the course of this litigation, the Firm performed 5.30 hours of work in connection with this litigation. Based upon the firm’s current hourly rates, the lodestar value of the time is \$4,399.00. The chart below indicates the attorneys at the 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 Co-Lead Counsel.

<i>NAME</i>	<i>TITLE</i>	<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Medici, Carmen Anthony	Partner	5.30	830	4,399.00
<b><i>TOTAL</i></b>		<b><i>5.30</i></b>		<b><i>\$4,399.00</i></b>

6. All of the services performed by my 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 Co-Lead Counsel. The rates at which the Firm seeks compensation are its usual and customary hourly rates charged for similar work.

7. The Firm seeks payment of expenses/charges in the amount of \$5,812.70. These expenses were reasonable and necessary in connection with this litigation and are summarized in the chart below. Expense documentation has been provided to Co-Lead Counsel for audit and review.

<i>CATEGORY</i>	<i>AMOUNT</i>
Filing, Witness and Other Fees	\$ 406.85
Transportation, Hotels & Meals	3,343.91
Telephone, Facsimile	0.36
Postage	16.51
Messenger, Overnight Delivery	22.38
Court Hearing and Deposition Reporting, and Transcripts	244.55
Online Legal and Financial Research	1,778.14
<b><i>TOTAL</i></b>	<b><i>\$ 5,812.70</i></b>

8. The expenses are reflected on the books and records of the Firm. These books and records are prepared from checks and expense vouchers that are regularly kept and maintained by the Firm and accurately reflect the expenses.

9. 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 Co-Lead 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 San Diego, California, on May 1, 2020.

A handwritten signature in black ink, appearing to read "Alex Bernay", written in a cursive style. The signature is positioned above a horizontal line.

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ALEXANDRA S. BERNAY