

**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 HOLLIS SALZMAN IN SUPPORT OF  
CLASS COUNSEL’S MOTION FOR ATTORNEY’S FEES, COSTS,  
AND SERVICE AWARDS**

I, Hollis Salzman, declare as follows:

1. I am a partner of Robins Kaplan LLP (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. Robins Kaplan LLP is among the nation’s premier trial law firms, with more than 250 attorneys in eight major cities. The firm has over 80 years of litigation experience in representing corporate, government, and individual parties on both sides of the courtroom. We have obtained over \$15 billion in recoveries on behalf of our clients in antitrust litigation. Since 2008, Robins Kaplan has contributed over 25,000 hours—more than 7 percent of the firm’s total billable hours—to *pro bono* legal services. I serve as Co-Chair of Robins Kaplan’s Antitrust & Trade Regulation Practice Group. I have over two decades of plaintiffs’ antitrust class action experience and have been nationally recognized as one of the leading antitrust litigators in the country for my work on cases such as *In re Air Cargo Shipping Services Antitrust Litigation*, MDL No. 1775 (E.D.N.Y.) (\$1.2 billion in settlements), and *In re Automotive Parts Antitrust*

*Litig.*, MDL No. 2311 (E.D. Mich.) (\$1 billion in settlements). I have overseen Robins Kaplan's work in *In re Railway Industry Employee No-Poach Antitrust Litigation*.

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"): researching claims for litigation, analyzing market conditions and economic data, communicating with our clients and obtaining their records, preparing for and arguing the motion for centralization before the Judicial Panel on Multidistrict Litigation, editing expert, ESI and deposition protocols, and analyzing legal issues concerning class representatives.

5. Summary of Time and Expenses. During the course of this litigation, the Firm performed 174.90 hours of work in connection with this litigation. Based upon the Firm's current hourly rates, the lodestar value of the time is \$107,908.50. The chart below indicates the attorneys and paralegals 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.

<b><u>Timekeeper</u></b>	<b><u>Hours</u></b>	<b><u>Hourly Rate</u></b>	<b><u>Lodestar</u></b>
Bernard Persky (P) <sup>1</sup>	2.00	\$950.00	\$1,900.00
Hollis Salzman (P)	5.90	\$900.00	\$5,310.00
Thomas J. Undlin (P)	1.50	\$900.00	\$1,350.00
Kellie C. Lerner (P)	13.30	\$800.00	\$10,640.00
Aaron M. Sheanin (P)	42.40	\$795.00	\$33,708.00
Tai S. Milder (C)	0.70	\$750.00	\$525.00
David B. Rochelson (A)	56.80	\$610.00	\$34,648.00
Vincent A. Licata (A)	0.70	\$490.00	\$343.00
Nahid A. Shaikh (A)	19.80	\$465.00	\$9,207.00
Jeffrey D. Baum (PL)	17.20	\$325.00	\$5,590.00
Michael Turitto (PL)	3.10	\$325.00	\$1,007.50
Audra M. O'Rourke (PL)	11.50	\$320.00	\$3,680.00
<b><u>Totals:</u></b>	174.90		\$107,908.50

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. During the course of this litigation, the Firm incurred expenses in the sum of \$11,190.32. These expenses were reasonably and necessarily incurred in connection with this litigation and are summarized in the chart below. Expense documentation has been provided to Lead Counsel for audit and review.

<b><u>Description</u></b>	<b><u>Amount</u></b>
Internal Reproduction / Copies	\$ 442.90
Court Fees (Filing costs, etc.)	\$ 70.00

<sup>1</sup> Timekeepers identified by (P) are partners, (C) are counsel, (A) are associates, and (PL) are paralegals.

Computer Research	\$ 1,893.33
Telephone/Fax/E-mail	\$ 33.34
Postage/Express Delivery/Messenger	\$ 1,267.32
Witness/Service Fees	\$ 2,295.10
Air Transportation	\$ 2,485.00
Ground Transportation	\$ 930.80
Meals	\$ 617.94
Lodging	\$ 923.90
Miscellaneous/Other (Travel - Internet, Baggage Fee, Agent Fee)	\$ 230.69
<b>TOTAL EXPENSES</b>	<b>\$11,190.32</b>

8. The expenses incurred 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 incurred.

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 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 New York, New York on May 1, 2020.

By: /s/ Hollis Salzman  
Hollis Salzman