

**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 ERIC R. HARLAN IN SUPPORT OF
CLASS COUNSEL’S MOTION FOR ATTORNEYS’ FEES, COSTS,
AND SERVICE AWARDS**

I, Eric R. Harlan, declare as follows:

1. I am a partner at Shapiro Sher Guinot & Sandler, P.A. (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. The Firm regularly represents clients in complex civil litigation, including banking, financial, and bankruptcy litigation proceedings. The Firm served as class counsel in an antitrust action against manufacturers of titanium dioxide in the U.S. District Court for the District of Maryland, which matter settled for in excess of \$160 million in 2013. I have practiced in the field of complex litigation, and have represented clients in such matters in the federal and state courts for nearly 25 years.
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 incurred expenses in the sum of \$4,335.00. 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.

<u>DESCRIPTION</u>	<u>AMOUNT</u>
Court Fees (Filing costs, etc.)	\$ 3,200.00
Process Server Fees	\$ 1,135.00
TOTAL	\$ 4,335.00

5. 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.

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 Baltimore, Maryland on May 11, 2020.



Eric R. Harlan