

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Laydon v. Mizuho Bank, Ltd., et al.

No. 12-cv-3419 (GBD)

Sonterra Capital Master Fund Ltd., et al. v. UBS AG, et al.

No. 15-cv-5844 (GBD)

DECLARATION OF NUSSBAUM LAW GROUP, P.C. IN SUPPORT OF
CLASS COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES

I, Linda Nussbaum, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a director with the law firm of Nussbaum Law Group, P.C. The statements herein are true to the best of my personal knowledge, information and belief based on the books and records of Nussbaum Law Group, P.C. (NLG) and information received from its attorneys and staff.

2. NLG serves as additional Plaintiffs' counsel for the putative class in these actions.

3. I respectfully submit this declaration in support of Class Counsel's Motion for Award of Attorneys' Fees, and seek attorneys' fees in these actions.

4. During the course of this litigation, and as detailed herein, NLG worked on assignments that it was specifically directed to perform by Class Counsel Lowey Dannenberg, P.C.

5. Set forth below are NLG's legal services rendered in this litigation, the lodestar value of those services and the expenses reasonably incurred by the firm in connection with this litigation for which reimbursement is requested.

6. Among the services NLG performed on behalf of the putative class in connection with the prosecution of the litigation include, but are not limited to, the following: review and analysis of additional plaintiffs' data and general assignments given by Class Counsel.

7. The schedule in ¶ 8 below is a summary reflecting the amount of time spent by the attorneys of NLG involved in this litigation, and the lodestar calculations based on the firm's current hourly billing rates. The schedule was prepared based upon daily time records maintained by attorneys and professional support staff at NLG. The schedule in ¶ 11 below reflects the expenses incurred by the firm in its representation of the putative class in this litigation thus far.

8. From the inception of this litigation through September 30, 2017, our firm's total fee compensable time for which it seeks an award of attorneys' fees is summarized below.

| Attorneys | Rates | Hours | Charges |
|-----------------|-------|-------|-------------|
| Linda Nussbaum | \$950 | 10.20 | \$9,690.00 |
| Bart Cohen | \$875 | 13.10 | \$11,462.50 |
| Susan Schwaiger | \$775 | .70 | \$542.50 |
| TOTALS | - | 24.00 | \$21,695.00 |

9. Thus, the total time for which my firm is requesting an award of legal fees is 24.00 hours. The total lodestar value of these professional services is \$21,695.00

10. The above hourly rates for NLG's attorneys are the firm's current hourly rates. The firm's lodestar figures do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in the firm's current billing rates.

11. As detailed and categorized in the below schedule, NLG has incurred a total of \$98.01 in expenses for which it will be reimbursed from the litigation expense fund created by this Court. See *Sonterra Capital Master Fund Ltd., et al. v. UBS AG, et al.*, No. 15-cv-5844 (GBD), ECF No. 297 ¶ 3.

| Expense Categories | Cumulative Expenses |
|---------------------------------------|---------------------|
| In-House Printing and Copies | \$36.00 |
| Computer Research, Databases & Docket | \$62.01 |
| TOTAL | \$98.01 |

12. The above schedule was prepared based upon expense records reflected in the books and records of NLG. These books and records are prepared from expense vouchers, check records, receipts and other source materials.

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

Executed on October 19, 2017


