

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 ROBERT G. EISLER IN SUPPORT OF
CLASS COUNSEL'S PETITION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES AND AN INCENTIVE AWARD**

I, Robert G. Eisler, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a partner with the law firm of Grant & Eisenhofer. The statements herein are true to the best of my personal knowledge, information and belief based on the books and records of Grant & Eisenhofer and information received from its attorneys and staff.

2. Grant & Eisenhofer serves as additional Plaintiffs' counsel for the putative class in this action.

3. I respectfully submit this declaration in support of Class Counsel's Petition for an Award of Attorneys' Fees, Reimbursement of Expenses and an Incentive Award, and seek attorneys' fees and reimbursement for expenses my firm incurred in this action.

4. During the course of this litigation, and as detailed herein, Grant & Eisenhofer worked on assignments that it was specifically directed to perform by Lead Counsel Lowey Dannenberg Cohen & Hart, P.C.

5. Set forth below are Grant & Eisenhofer'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 Grant & Eisenhofer performed on behalf of the putative class in connection with the prosecution of the litigation include, but is not limited to, the following: legal and factual research; briefing; work with economic experts; preparation for mediation sessions and multiple mediation sessions.

7. The schedule in ¶8 below is a summary reflecting the amount of time spent by the attorneys and professional support staff of Grant & Eisenhofer 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 Grant & Eisenhofer. 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 August 31, 2016, Grant & Eisenhofer's total fee compensable time for which it seeks an award of attorneys' fees is summarized below.

<u>Attorneys</u>	<u>Rates</u>	<u>Hours</u>	<u>Charges</u>
James S. Sabella	\$925.00	71.1	\$65,767.50
Robert G. Eisler	\$895.00	128.2	\$114,739.00
TOTALS:		199.3	\$180,506.50

9. Thus, the total time for which my firm is requesting an award of legal fees is 199.3 hours. The total lodestar value of these professional services is \$180,506.50.

10. The above hourly rates for Grant & Eisenhofer'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, Grant & Eisenhofer has incurred a total of \$2,704.54 in expenses for which it is currently requesting reimbursement.

<u>Expense Categories</u>	<u>Cumulative Expenses</u>
Meeting Expenses	\$479.43
Travel	\$1,345.93
Duplication	\$290.10
Electronic Research	\$589.08
TOTAL	\$2,704.54

12. The above schedule was prepared based upon expense records reflected in the books and records of Grant & Eisenhofer. 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 September 23, 2016



 ROBERT G. EISLER