

# EXHIBIT D

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DANA POTVIN, LISA BULTMAN,  
MICHAEL MCKARRY, DAVID  
WABAKKEN, MOHAMED HASSAN,  
CHRISTINA MERRILL, ERIC LEVINE,  
PATRICK DONAHUES, DEBBI BROWN,  
CAROL RADICE, TERRENCE BERRY,  
AMANDA GREEN, DAVID  
WILDHAGEN, KATY DOYLE, TASHIA  
CLENDANIEL, HOGAN POPKESS,  
KORY WHEELER, HARRY O'BOYLE,  
JOE RAMAGLI, ERIC KOVALIK,  
CHARLES HILLIER, LABRANDA  
SHELTON, ADAM MOORE, TINA  
GROVE, KEECH ARNSTEN, SCOTT  
CARTER, MIKE SHERROD, CHRISTI  
JOHNSON, MARY KOELZER AND  
MARK STEVENS, Individually And On  
Behalf Of All Others Similarly Situated,  
Plaintiffs,

vs.

VOLKSWAGEN  
AKTIENGESELLSCHAFT,  
VOLKSWAGEN GROUP OF AMERICA,  
INC., and VOLKSWAGEN GROUP OF  
AMERICA CHATTANOOGA  
OPERATIONS, LLC,  
Defendants.

Case No.: 2:22-cv-01537 (EP) (JSA)

**DECLARATION OF SEAN K.  
COLLINS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
AWARD OF ATTORNEYS' FEES,  
REIMBURSEMENT OF EXPENSES,  
AND PLAINTIFFS' SERVICE  
AWARDS**

I, Sean K. Collins, declare and state as follows:

1. I am an attorney admitted *pro hac vice* in this litigation, the founder of the Law Offices of Sean K. Collins (“LOSKC”), and counsel of record for Plaintiffs in this case. This Declaration is based on my personal knowledge, and if called upon to do so, I could and would testify competently thereto.

2. As of October 31, 2024, my firm has spent 127.6 hours working on this matter. The total lodestar amount for this work is \$111,580. This chart provides the hours billed and lodestar associated with each biller at current rates:

IN RE VWATLAS LITIGATION				
INCEPTION THROUGH OCTOBER 15, 2024				
TIMEKEEPER/CASE	STATUS	HOURS	RATE	LODESTAR
<b>ATTORNEYS:</b>				
Sean Collins	Attorney	114.70	925.00	106,097.50
Romelia E. Leach	Staff Attorney	12.90	425.00	5,482.50
<b>TOTAL ATTORNEY</b>	<b>TOTAL</b>	<b>127.60</b>		<b>111,580.00</b>
<b>PARALEGALS:</b>				
<b>TOTAL PARALEGAL</b>	<b>TOTAL</b>	<b>0.00</b>		<b>0.00</b>
<b>TOTAL LODESTAR</b>	<b>TOTAL</b>	<b>127.60</b>		<b>111,580.00</b>

3. The work reflected above was reasonable and necessary to the prosecution and settlement of this case

4. As of October 31, 2024, my firm has incurred \$150 in expenses working on this matter. This \$150 expense incurred by LOSKC in the Action is the Pro Hac Vice fee that I incurred on this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 4, 2024, in Boston, Massachusetts.

/s/ Sean K. Collins

Sean K. Collins