

EXHIBIT B

**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 STEVE W.
BERMAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES,
AND PLAINTIFFS' SERVICE
AWARDS**

I, Steve W. Berman, declare and state as follows:

1. I am an attorney admitted *pro hac vice* in this litigation, the managing partner of the law firm Hagens Berman Sobol Shapiro LLP (“Hagens Berman”), 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 385.2 hours working on this matter. The total lodestar amount for this work is \$261,175.00. Exhibit 1 provides the hours billed and lodestar associated with each biller at current rates. The work performed and reflected in Exhibit 1 was reasonable and necessary to the prosecution and settlement of this case

3. As of October 31, 2024, my firm has incurred \$4,826.65 in expenses working on this matter. The expenses incurred by Hagens Berman in the Action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials, and are an accurate record for the expenses incurred. These expenses were reasonably incurred in the prosecution of the case and consist of those itemized in Exhibit 2.

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 Seattle, Washington.

/s/ Steve W. Berman
Steve W. Berman

EXHIBIT 1

VW ATLAS WIRING HARNESS
 Hagens Berman Sobol Shapiro LLP
 LODESTAR TOTALS - INCEPTION TO DATE

ATTORNEY	STATUS	CURRENT HOURLY RATE	TOTAL HOURS	LODESTAR AT CURRENT RATES
Steve Berman	Partner	\$1,350.00	11.10	\$14,985.00
Sean Matt	Partner	\$975.00	135.90	\$132,502.50
Shelby Smith	Of Counsel	\$650.00	70.50	\$45,825.00
Joey Kingerski	Associate	\$400.00	112.60	\$45,040.00
		ATTORNEY TOTAL	330.10	\$238,352.50
PROFESSIONAL STAFF	STATUS	CURRENT HOURLY RATE	TOTAL HOURS	LODESTAR AT CURRENT RATES
Carrie Flexer	Paralegal	\$425.00	46.30	\$19,677.50
Joseph Salonga	Paralegal	\$400.00	1.30	\$520.00
Shelby Taylor	Paralegal	\$350.00	2.40	\$840.00
Radha Kerzan	Paralegal	\$350.00	5.10	\$1,785.00
		PARALEGAL TOTAL	55.10	\$22,822.50
		GRAND TOTAL	385.20	\$261,175.00

EXHIBIT 2

VW ATLAS WIRING HARNESS
Hagens Berman Sobol Shapiro LLP
EXPENSE TOTALS - INCEPTION TO DATE

CATEGORY	AMOUNT
Internal Prints/Copies at \$0.25 per page	\$948.75
Court Fees/Filing Fees	\$625.41
Mediation Fees	\$2,820.63
Overnight Shipping/Postage	\$199.46
Online Document Hosting (Everlaw)	\$77.20
Online Research (LexisNexis/Westlaw/PACER)	\$155.20
	\$4,826.65