

EXHIBIT A

**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 JAMES E.
CECCHI IN SUPPORT OF
PLAINTIFFS' MOTION FOR
AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES,
AND PLAINTIFFS' SERVICE
AWARDS**

I, James E. Cecchi, declare and state as follows:

1. I am a Partner of Carella Byrne Cecchi Brody Agnello, P.C. and part of the Co-Lead Counsel team 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 912 hours working on this matter. The total lodestar amount for this work is \$794,162.50. 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 \$5,132.62 in expenses working on this matter. The expenses incurred by Carella Byrne 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 Roseland, New Jersey.

/s/ James E. Cecchi
James E. Cecchi

EXHIBIT 1

In re: Mike Sherrod et al. vs. Volkswagen et al.,
 No. 2:22-cv-01537
 CARELLA BYRNE CECCHI BRODY & AGNELLO, P.C.
 Inception through October 31, 2024

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Cecchi, James	(P)	30.30	\$ 1,300.00	\$ 39,390.00
Taylor, Lindsey	(P)	0.20	\$ 975.00	\$ 195.00
Ecklund, Donald	(P)	0.40	\$ 1,000.00	\$ 400.00
Bower, Zach	(P)	20.80	\$ 950.00	\$ 19,760.00
Bartlett, Caroline	(P)	255.60	\$ 975.00	\$ 249,210.00
Cooper, Kevin	(P)	6.80	\$ 725.00	\$ 4,930.00
O'Brien, James	(OC)	378.50	\$ 975.00	\$ 369,037.50
Steele, Jordan	(A)	91.90	\$ 600.00	\$ 55,140.00
O'Toole, Brian	(A)	73.10	\$ 600.00	\$ 43,860.00
Tempesta, Laura	(PR)	3.4	\$ 225.00	\$ 765.00
Falduto, Jeff	(PR)	15.60	\$ 225.00	\$ 3,510.00
Rago, Mary Ellen	(PR)	1.60	\$ 225.00	\$ 360.00
Luhn, Tabitha	(PR)	11.40	\$ 225.00	\$ 2,565.00
Davantes, Haley	(PR)	4.50	\$ 225.00	\$ 1,012.50
Petracco, Francis	(PR)	14.30	\$ 225.00	\$ 3,217.50
Way, Penelope	(PR)	3.60	\$ 225.00	\$ 810.00
TOTAL		912.00		\$794,162.50

(P) Partner
 (A) Associate
 (OC) Of Counsel
 (PR) Paralegal

EXHIBIT 2

In re: Mike Sherrod et al. vs. Volkswagen et al.,
No. 2:22-cv-01537
CARELLA BYRNE CECCHI BRODY & AGNELLO, P.C.
Inception through October 31, 2024

<i>CATEGORY</i>	<i>AMOUNT</i>
Filing, Court, Witness and Other Fees	\$894.9
Transportation, Hotels & Meals	\$1447.17
Guaranteed Subpoena Service, Inc	\$211.30
Mediation Fees (JAMS Inc.)	\$2,729.25
<i>TOTAL</i>	<i>\$5,132.62</i>