

EXHIBIT C

**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 JEFFREY S.
GOLDENBERG IN SUPPORT OF
PLAINTIFFS' MOTION FOR
AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES,
AND PLAINTIFFS' SERVICE
AWARDS**

I, Jeffrey S. Goldenberg, declare and state as follows:

1. I am an attorney admitted *pro hac vice* in this litigation, a founding partner of the law firm Goldenberg Schneider, LPA (“Goldenberg Schneider”), 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 would testify competently thereto.

2. As of October 31, 2024, my firm has spent 752.2 hours working on this matter. The total lodestar amount for this work is \$489,677.50. 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 \$2,666.02 in expenses working on this matter. The expenses incurred by Goldenberg Schneider 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 1.

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 Cincinnati, Ohio.

/s/ Jeffrey S. Goldenberg

Jeffrey S. Goldenberg

EXHIBIT 1

NAME	POSITION	YEARS OF PRACTICE	RATE	HOURS	LODESTAR
Jeffrey S. Goldenberg	Partner	30	\$925	177.1	\$163,817.50
Todd B. Naylor	Partner	27	\$875	178.6	\$156,275.00
Robert B. Sherwood	Partner	22	\$825	124	\$102,300.00
Stephanie Vaaler	Paralegal	36	\$250	261.3	\$65,325.00
Cheryl Pence	Legal Admin.	35	\$175	11.2	\$1,960.00
TOTAL				752.2	\$489,677.50

Category	Total Expense
Postage/Overnight Shipping	\$370.34
In-House Photocopying	\$186.30
Online Research: Lexis/Westlaw/Pacer	\$1,303.50
Court Fees/Filing Fees (Goldenberg PHV fee/Carella Byrne)	\$150.00
Investigation/Service Fees (Professional Legal Video – inspection on 8/3/2023 in Denver, CO)	\$650.00
Transcripts: Donahue crash report	\$5.88
TOTAL	\$2,666.02