

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

GAYL JACKSON, *et al.*

Plaintiffs

v.

VIKING GROUP, INC., *et al.*

Defendants.

Civil Action No. 8:18-cv-02356-PJM

**DECLARATION OF JOSEPH G. SAUDER IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, EXPENSES AND SERVICE AWARDS**

I, Joseph G. Sauder, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a member in good standing of the bar of the Commonwealth of Pennsylvania, and I am admitted *pro hac vice* to this Court and am counsel for Plaintiffs and the Settlement Class. I respectfully submit this declaration in further support of Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards. The following is based on my personal knowledge, and if called upon to do so, I could and would competently testify to the statements set forth below.

2. I am a partner of the law firm of Sauder Schelkopf LLC in Berwyn, Pennsylvania. I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees, Expenses, and Incentive Awards.

3. Since 2012, I have been selected by the National Trial Lawyers Association as one of the Top 100 Trial Lawyers in Pennsylvania. Since 2011, I have been selected as a Pennsylvania SuperLawyer, a distinction held by the top 5% of attorneys in PA, as chosen by their peers and through the independent research of Law & Politics. The American Lawyer

Media, publisher of The Legal Intelligencer and the Pennsylvania Law Weekly, named me as one of the “Lawyers on the Fast Track” a distinction that recognized thirty-five Pennsylvania attorneys under the age of 40 who show outstanding promise in the legal profession and make a significant commitment to their community.

4. I have an extensive background in litigation on behalf of consumers, and I am currently serving as lead or co-lead counsel in many class actions in federal courts across the country, including product defect cases similar to this one. This experience, coupled with the experience of our co-counsel, enabled our firms to undertake this matter and to successfully combat the resources of Defendants and their capable and experienced counsel.

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5. As of May 1, 2020, my firm has spent approximately 1,098 hours working on this case, for a total lodestar amount of \$722,250.00.

6. The hourly rates of Sauder Schelkopf attorneys ranged from \$400 per hour for associate work, and \$700 per hour for partner work.

7. Due to the amount of privileged information contained in the hourly billing records, those detailed records are not attached here, but can be provided in camera should this Court wish to review them.

8. Class Counsel made significant efforts toward the efficient allocation of work between them. Partners in the firms coordinated their work assignments on a regular basis to prevent unnecessary duplication of work across the firms.

9. Having the firms serving as Class Counsel work on the case together added substantial value to the case, as borne out by the ultimate relief achieved for the Class. Class Counsel were able to work together to develop sophisticated and effective strategies for pursuing

the claims of Plaintiffs and the Classes.

10. Moreover, the arrangement between the Class Counsel firms also reflects the reality of large consumer protection class actions where, because of the great risk involved, multiple firms work together to spread the risk.

11. The work performed in this case was reasonable and necessary to the prosecution and settlement of this case. Class Counsel conducted a significant factual investigation during the prosecution of this action. Because of their comprehensive evaluation of the facts and law, Class Counsel was able to settle this case for a very substantial sum. Class Counsel provided Class Members with substantive and certain relief much sooner than if litigation of this matter had continued.

12. As settlement administration is ongoing, and based on my experience in previous consumer protection class actions, the lodestar figures reported herein will meaningfully increase by the time the settlement is completely and finally administered.

COUNSEL'S EXPENSES

13. This litigation required Class Counsel to advance costs. Where corporate defendants and their attorneys are well funded, as was true here and in most national consumer protection cases, this type of litigation can prove to be expensive and risky. Because the risk of advancing costs in this type of litigation is significant, doing so is often cost prohibitive to many attorneys.

14. As of May 1, 2020, my firm has expended costs of approximately \$13,977.29, including the cost of mediation. These expenses are reflected in the books and records of my firm. These books and records are prepared from expense vouchers and check records and are an

accurate record of the expenses incurred. All of the expenses incurred were reasonable and necessary to the prosecution of this case.

15. On behalf of Plaintiffs and all counsel in this litigation, I respectfully request that the Court award the requested attorneys' fees and costs.

I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct.

Dated: May 22, 2020

/s/ Joseph G. Sauder
Joseph G. Sauder