

# **EXHIBIT C**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LORI COWEN, et al.,

Plaintiff,

vs.

LENNY & LARRY'S, INC.,

Defendant.

Case No. 1:17-CV-01530

Judge Robert W. Gettleman

Magistrate Young B. Kim

**DECLARATION OF EDWARD WALLACE  
RELATING TO WEXLER WALLACE LLP'S LODESTAR,  
EXPENSES, AND WORK PERFORMED IN THIS CASE**

I, Edward A. Wallace, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and recollection:

1. I am a partner at the law firm of Wexler Wallace LLP and Class Counsel for Plaintiffs and the Settlement Class in the above-captioned litigation. I submit this declaration based on my own personal knowledge, and, if called to do so, I could testify competently to the matters stated herein.
2. I am an attorney licensed to practice before the bar of the State of Illinois.
3. Wexler Wallace LLP is a nationally-recognized leading firm in complex class action and multidistrict litigation, and attorneys at the firm have been appointed to numerous leadership positions in class action cases across the country, where they have successfully settled numerous matters or tried those cases to verdict. I have personally specialized in complex class action and multidistrict litigation for over two decades, and have substantial experience representing plaintiffs in all phases of complex litigation, including a wide variety of consumer protection, antitrust, securities, banking regulation, business, and contractual class-action cases.

4. The time reflected below was time spent in the prosecution of this case by Wexler Wallace LLP attorneys and staff. Wexler Wallace LLP and the other Class Counsel were careful not to expend unnecessary hours and not to duplicate work done by others. The time submitted herein reflects only work done on behalf of the Settlement Class.

**WEXLER WALLACE'S LODESTAR**

4. Below is a summary of the time spent by Wexler Wallace's attorneys and staff who were involved in this action, and the lodestar calculation based on the firm's billing rates in effect on January 1, 2019. The summary was prepared at my request from contemporaneous daily time records regularly prepared and maintained by Wexler Wallace, which are available at the request of the Court.

5. As of January 31, 2019, the total number of recorded hours spent on this litigation by Wexler Wallace is 365.00 and the lodestar amount for attorney and support staff time, based on the firm's current rates, is \$202,236.50. A breakdown of Wexler Wallace's lodestar is reflected below:

<b>Name</b>	<b>Position</b>	<b>Hours</b>	<b>Rate</b>	<b>Lodestar</b>
Edward Wallace	Partner	38.60	900.00	\$34,740.00
Mark R. Miller	Partner	7.70	750.00	5,775.00
Amy E Keller	Associate	6.60	485.00	3,201.00
Adam Prom	Associate	95.70	340.00	32,538.00
Tyler J. Story	Associate	100.50	550.00	55,275.00
Richard L Miller II	Of Counsel	86.30	725.00	62,567.50
Michelle Perkovic	Law Clerk	14.90	275.00	4,097.50
Amy Catena	Paralegal	3.60	275.00	990.00
Christopher Bogusch	Paralegal	11.10	275.00	3,052.50
<b>TOTAL</b>		<b>365.00</b>		<b>\$202,236.50</b>

6. The hourly rates shown above are charged for each individual in all of our cases. The hourly rates for the partners, associate attorneys, and professional staff are the usual and customary rates

that Wexler Wallace has charged in non-contingent matters and that have been accepted and approved in other recent class action litigation around the country.

7. As Wexler Wallace's work on this case is ongoing, I anticipate that Wexler Wallace's lodestar will increase from the present date to the date this case is finally resolved, in light of work that will be required in connection with finalizing the final approval papers, implementing the Settlement through to its conclusion, communicating with Settlement Class Members, coordinating efforts with Class Counsel, Defendant's Counsel, and the Settlement Administrator, and preparing for and participating in the Final Approval Hearing scheduled for March 19, 2019.

**SUMMARY OF WORK PERFORMED BY WEXLER WALLACE**

8. In this matter, my firm made meaningful contributions to the case by conducting a thorough factual and legal investigation, engaging in discussions with other Class Counsel concerning strategy, assisting with legal and factual research, appearing in court, and drafting pleadings and oppositions to motions filed in this case.

9. Working in conjunction with other Class Counsel, Wexler Wallace conducted the initial case investigation and research concerning factual and legal issues prior to filing the Complaint and throughout the case until Settlement; assisted in selecting and retaining Plaintiffs; corresponded with Defendant's counsel on matters in this litigation; researched and drafted the memorandum in opposition to Defendant's motion to dismiss and motion to strike class allegations; reviewed and analyzed documents produced by Defendant; engaged in extensive and lengthy settlement negotiations; prepared papers in connection with preliminary approval of settlement; conferred regarding Settlement Class Members' inquiries about the proposed Settlement; and performed various Settlement-related tasks.

10. Wexler Wallace will continue to represent the Settlement Class through final approval and completion of the claims administration process.

**WEXLER WALLACE’S EXPENSES**

11. The firm has expended \$6,016.80 in unreimbursed expenses, which include such categories as expert costs, filing fees, online legal research, and subpoena fees to prosecute this action, as follows:

<b>EXPENSE</b>	<b>AMOUNT</b>
Telephone	\$17.28
Travel / Meals	16.82
Postage	6.59
Filing Fees	400.00
Service/Subpoena Fees	170.00
Computer Research	254.16
Delivery Services	182.77
Internal Reproduction/Copies	10.19
Mediator	4,958.99
<b>TOTAL</b>	<b>\$6,016.80</b>

12. The expenses incurred pertaining to this case are reflected in the books and records of this firm. All the expenses incurred were reasonable and necessary to the prosecution of this case.

13. Class Counsel anticipate that there may be additional expenses in preparing for and attending the Final Approval Hearing.

DATED: February 5, 2019

Respectfully submitted,

/s/ Edward A. Wallace  
 Edward A. Wallace  
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