



3. From the inception of this case through May 31, 2020, I performed a total of 108.7 billable hours on this case. This total excludes certain time that I have excised from this application or otherwise reduced, based on the exercise of billing judgment. Based upon an hourly rate of \$650, the total lodestar value of this billable time is \$70,655.00. This schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by me.<sup>1</sup> I did not incur any expenses attributed to litigating this matter.

4. Federal courts have approved fee requests for me based on similar rates in similar data breach cases. *See, e.g., In re: Home Depot, Inc., Cust. Data Security Breach Litig.*, No. 1:14-md-02583, D.I. 261 at 2-3 (N.D. Ga. Aug. 23, 2016); *id.*, D.I. 227-1 at 29 (June 27, 2016) (identifying standardized hourly rates, including \$600 for a partner or counsel with between 10 and 20 years of experience). In *Home Depot*, I billed at \$600 per hour, and the Court approved the fee request.; *In re: Target Corp. Cust. Data Sec. Breach Litig.*, No. 0:14-md-02522, D.I. 645 at 8 (D. Minn. Nov. 17, 2015). The harmonized rate applicable to my experience level (between 11 and 20 years) was \$550. *Id.*, 0:14-md-02522, D.I. 482 at 26. In *Target*, I billed at \$550 per hour, and the Court approved the fee request. *Id.*, D.I. 483-3 at 2 (July 10, 2015); *id.*, D.I. 645 at 8.

5. All of the time billed to this case by my firm was reasonable and necessary in the prosecution of this case.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 25, 2020

/s/ Cornelius P. Dukelow  
Cornelius P. Dukelow

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<sup>1</sup> My detailed time records are available to the Court for inspection upon request.