

1 **COTCHETT, PITRE & McCARTHY, LLP**

2 Anne Marie Murphy (SBN 202540)
3 Mark C. Molumphy (SBN 168009)
4 Tyson C. Redenbarger (SBN 294424)
5 San Francisco Airport Office Center
6 840 Malcolm Road, Suite 200
7 Burlingame, CA 94010
8 Telephone: (650) 697-6000
9 Facsimile: (650) 697-0577
10 amurphy@cpmlegal.com
11 mmolumphy@cpmlegal.com
12 tredenbarger@cpmlegal.com

7 **KAPLAN FOX & KILSHEIMER LLP**

8 Matthew B. George (SBN 239322)
9 Kathleen A. Herkenhoff (SBN 168562)
10 Laurence D. King (SBN 206423)
11 1999 Harrison Street, Suite 1560
12 Oakland, CA 94612
13 Telephone: 415-772-4700
14 Facsimile: 415-772-4707
15 mgeorge@kaplanfox.com
16 kherkenhoff@kaplanfox.com
17 lking@kaplanfox.com

18 *Co-Lead Counsel for Plaintiffs*

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

17 In Re: Robinhood Outage Litigation

Master File No. 3:20-cv-01626-JD

18 CLASS ACTION

19 **DECLARATION OF STEVE LOPEZ IN**
20 **SUPPORT OF PLAINTIFFS' MOTION**
21 **FOR FINAL APPROVAL OF PROPOSED**
22 **SETTLEMENT; AND FOR ATTORNEYS'**
23 **FEEES, EXPENSES, AND SERVICE**
24 **AWARDS**

25 Date: June 15, 2023
26 Time: 10:00 a.m
27 Judge: Hon. James Donato
28 Ctrm: 11, 19th Floor

1 I, STEVE LOPEZ, declare as follow:

2 1. I am a member of Gibbs Law Group LLP. I have personal knowledge of the matters
3 stated here, and, if called upon, I could and would competently testify thereto.

4 2. I submit this declaration in support of Plaintiffs' Motion for Final Approval of
5 Proposed Settlement and Motion for Attorneys' Fees, Expenses, and Service Awards ("Motions").

6 3. On July 22, 2020, I was appointed Liaison Counsel in this Action. EFC No. 65. My
7 primary role involved working with Class Counsel Anne Marie Murphy and Matthew B. George
8 ("Class Counsel"), to ensure that Plaintiffs' pretrial preparation, in particular the Plaintiffs' Counsels'
9 time reporting and billing, was conducted effectively, efficiently, and economically.

10 4. In my role, I conferred with Class Counsel concerning the proposed Time and
11 Expense Protocol prior to implementation. Starting in August 2020, Class Counsel, the Executive
12 Committee and additional Plaintiffs' Counsel, submitted to me detailed billing records on a monthly
13 basis, along with a summary of those records by timekeeper and by task code. Pursuant to the
14 protocol, the submissions were reviewed to confirm that they accorded with the protocol. When
15 appropriate, I corresponded with Plaintiffs' counsel regarding deficiencies in their reports and
16 necessary corrective actions. For example, at times I requested more detailed descriptions, identified
17 where too many lawyers had worked on a given task, or simply confirmed that certain entries were
18 not common benefit work. As a result of these efforts, Plaintiffs' Counsel diligently worked to
19 follow protocol requirements and were careful to follow it. Of course, I was always available to
20 discuss whatever issues or questions that Plaintiffs' counsel raised.

21 5. In addition to my real-time review of time and expenses on a monthly basis, I
22 continued to review the relevant time and expense records for each Executive Committee and
23 additional Plaintiffs' firm in connection with the filing of this declaration. In reviewing the monthly
24 and quarterly reports, I did not attempt to arrive at any particular amount of lodestar, or lodestar
25 reduction, or to reach any preconceived lodestar, multiplier, or percentage of the fund. Instead, my
26 sole aim was to ensure compliance with this Court's guiding principles on billing practices, fees,
27 costs, and expenses and the mandates of the Court's order appointing Class Counsel.

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1 6. I also coordinated with Class Counsel, the Executive Committee firms, and the
 2 additional Plaintiffs’ firms to prepare declarations (“Declaration(s)”) in support of their time and
 3 expense submissions in support of the Motion. Attached hereto as **Exhibits 1-14** are true and correct
 4 copies of the firm Declarations, each accompanied by three exhibits: (1) **Exhibit A** is lodestar
 5 calculation using the most recent reported hourly rate for each timekeeper; (2) **Exhibit B** is a
 6 calculation of total expenses by category; and (3) **Exhibit C** is a firm resume. I have reviewed each
 7 Exhibit A and Exhibit B attached to the Declarations, and each appears to be accurate.

8 7. As reflected in the Declarations, the total lodestar reported for the period from
 9 appointment and consolidation through June 30, 2022, for Class Counsel, the Executive Committee,
 10 and additional Plaintiffs’ counsel is 9,281 hours of billable work, for a lodestar of approximately
 11 \$5,450,870. That total does not include any hours billed since June 30, 2022, when the Preliminary
 12 Approval Motion was prepared. The post-June 30, 2022, hours, up to December 31, 2022, equal over
 13 250 hours. Additionally, while I did not review and vet the pre-consolidation reports in the same
 14 fashion as the other submissions, I did review the pre-consolidation reports which reflect a significant
 15 amount of work counsel performed prior to consolidation. The total for this pre-consolidation work,
 16 from inception to consolidation on July 22, 2020, is \$1,756,586.50, representing over 3500 hours of
 17 work. In total, Plaintiffs’ Counsel performed over 13,300 hours of billable work from inception
 18 through December 31, 2022.

19 8. Of the total amount billed from consolidation until June 30, 2022, approximately 73%
 20 was performed by the two Class Counsel firms. A summary of the hours and lodestar figures by
 21 firm, from consolidation until June 30, 2022, is included below:

Role	Firm Name	Hours	Lodestar Total
Interim Co-Lead Counsel	Kaplan Fox	2,530.50	\$1,831,516.00
	CPM	4,249.80	\$2,393,007.50

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Executive Committee & Liaison Counsel	Ahdoot & Wolfson	21.50	\$17,645.00
	Beasley Allen	119.95	\$85,000.00
	Carlson Lynch	112.95	\$57,350.00
	Gibbs Law Group	85.50	\$58,960.50
	Lite DePalma & Greenberg	333.80	\$205,812.50
	Meyer Wilson	302.00	\$151,370.50
	Scott + Scott	268.40	\$138,428.50
	Shumaker Loop & Kendrick	750.10	\$219,313.00
	Wolf Haldenstein	59.10	\$29,634.00
Add'l Plaintiffs' Counsel	Bottini & Bottini	410.40	\$231,897.50
	Grabar Law Office	9.40	\$8,695.00
	Weiser Law Firm	27.80	\$22,240.00
Total		9281.20	\$5,450,870.00

9. Detailed billing records are available and will be provided upon request.

10. Attached hereto as **Exhibit 15** is a compilation of Plaintiffs' Counsel's unreimbursed expenses totaling \$1,102,432.84 from July 22, 2020 through March 17, 2023, in connection with the prosecution of this Action. Attached as **Exhibit 16** is a chart listing total expenses by category. These expenses were advanced by Plaintiffs' Counsel on a contingent basis. These expenses are supported by each firm's separate declaration (*see, infra*, at **Exhibit 1-14**). The total also reflects the total contributions by Class Counsel to the Litigation Fund established to finance the joint prosecution of this litigation, along with invoiced costs that are currently unpaid by the Litigation Fund, as described in **Exhibit 2** to the Joint Declaration in Support of Plaintiffs' Motion for Final Approval of Proposed Settlement, and for Attorneys' Fees, Expenses, and Service Awards, filed herewith. With the credit of unused funds applied, the total expenses sought total \$1,102,432.84.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true
2 to the best of my knowledge and belief. Executed on March 27, 2023, in Oakland, California.

3 **GIBBS LAW GROUP LLP**

4 /s/ Steve Lopez

5 STEVE LOPEZ

6 505 14th Street, Suite 1110

7 Oakland, California 94612

8 Telephone: (510) 350-9700

9 Facsimile: (510) 350-9701

10 sal@classlawgroup.com

11 *Liaison Counsel for Plaintiffs*

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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Declaration of Steve Lopez in Support of Motion for Final Approval of Proposed Settlement; Attorneys Fees, Expenses, and Service Awards. Pursuant to L.R 5-1(i)(3) regarding signatures, I, Anne Marie Murphy attest that concurrence in the filing of this document has been obtained.

DATED: March 27, 2023

/s/Anne Marie Murphy
Anne Marie Murphy