

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

REBECCA FRISKE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

BONNIER CORPORATION, a Delaware
corporation,

Defendant.

Case No. 16-cv-12799-DML-EAS

District Judge David M. Lawson
Magistrate Judge Elizabeth A.
Stafford

**DECLARATION OF DANIEL O. MYERS IN SUPPORT
OF MOTION FOR ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES**

I, Daniel O. Myers, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an adult over the age of 18, a resident of the State of Michigan, and the sole Member of The Law Firm of Daniel O. Myers, PLLC.
2. I have personal knowledge of all matters asserted herein, and if called to testify, could do so competently.
3. I, together with co-counsel Gary Lynch and Jamisen Etzel of Carlson Lynch LLP have been appointed Class Counsel in this case.
4. My firm, together with co-counsel Carlson Lynch, LLP and the law firm of Richardson, Patrick, Westbrook and Brickman, LLC took this case on a

contingent fee basis without any guarantee of payment for our efforts on behalf of Plaintiff and the class members.

5. I, along with co-counsel, investigated the bases for this lawsuit, crafted and filed the original and amended complaint, engaged in discovery including requesting and producing documents, taking and defending depositions, and third-party discovery, participated in two mediations in New York and Detroit, and engaged in negotiations that spanned months all in the process of litigating this case and bringing about resolution. Once the parties reached a tentative agreement, my firm and co-counsel worked with opposing counsel to finalize the terms of settlement, the settlement agreement, and the class notice documents and procedures.

6. As part of my work on this case, I interacted with the Class Representative, Rebecca Friske. Ms. Friske represented the interests of the Class Members by providing information to assist Class Counsel to investigate the claims, prepare the Complaint, and respond to the discovery requests of Defendants. The Class Representative also was informed and involved in the settlement process and preparation of the settlement papers, and approved the resulting settlement.

7. To date, and throughout the investigatory, litigation and settlement processes, I have expended 244.4 hours. This total does not include time I have deemed unnecessary or duplicative, or time spent preparing this declaration or the

accompanying Motion. The time incurred, along with the applicable hourly rate for such time is listed below:

Attorney	Experience	Hours	Rate	Total Fee
Daniel O. Myers	26 years	244.4	\$600.00	\$146,640

8. In addition to the time already expended, I anticipate expending a substantial number of additional hours throughout the final approval process, including preparing for and attending the fairness hearing, dealing with any claims administration issues, and responding to the objection.

9. I also have incurred \$3,032.21 in costs while investigating, litigating and settling this matter, primarily for travel to New York and Detroit for mediation and hearings.

I declare under penalty of perjury that the above and foregoing is true and accurate.

Executed this September 3, 2019, Traverse City, Michigan, County of Grand Traverse.

Dated: September 3, 2019

/s/ Daniel O. Myers
 DANIEL O. MYERS, P49250
 The Law Offices of Daniel O. Myers
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 Traverse City, MI 49684