

**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 GARY F. LYNCH IN SUPPORT OF MOTION  
FOR ATTORNEY'S FEES, EXPENSES AND INCENTIVE AWARDS**

I, Gary F. Lynch, 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 Commonwealth of Pennsylvania, and a partner at Carlson Lynch, LLP.

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 Daniel O. Myers, of The Law Firm of Daniel O. Myers, PLLC, have been appointed Class Counsel in this case.

4. My firm, together with co-counsel The Law Firm of Daniel O. Myers, PLLC, 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. My firm, along with co-counsel, investigated the bases for this lawsuit, crafted and filed the original and amended complaint, defended the complaints in response to a motion to dismiss; engaged in discovery including requesting and producing documents, taking and defending depositions, and serving third party subpoenas; moved for class certification three times; participated in mediation 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. To date, and throughout the investigatory, litigation and settlement processes, my firm has expended 609 hours for a total lodestar of \$322,380. This total does not include time I have deemed unnecessary or duplicative. The time incurred, along with the applicable hourly rate for such time is listed below:

Attorney	Experience	Hours	Rate	Total Fee
Gary F. Lynch	30	323.4	\$675.00	\$218,295.00
Jamisen A. Etzel	7	120.6	\$425.00	\$51,255.00
Kevin Abramowicz	3	115.8	\$350.00	\$40,530.00
Derek Markle	1	49.2	\$250.00	\$12,300.00

This time excludes all paralegal and administrator time, and excludes all time spent preparing the motion for fees or compiling time.

7. In addition to the time already expended, we anticipate to expend a substantial amount 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 objector.

8. My firm also has expended \$28,317.79 in reasonable, necessary costs while investigating, litigating and settling this matter. The costs were compiled from bills, receipts and statements retained by my firm, and are broken down as follows:

Description	Total Costs
Mediator fees	\$18,248.13
Depositions/Court Reporters	\$2,521.10
Travel (to court, mediations, depositions)	\$6,674.31
Service of Subpoenas	\$874.25

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

Executed this September 3, 2019, Pittsburgh, Pennsylvania.

/s/ Gary F. Lynch  
 Gary F. Lynch  
 CARLSON LYNCH, LLP  
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 Pittsburgh, PA 15222  
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