

**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 ROBERT S. WOOD IN SUPPORT
OF MOTION FOR ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES**

Robert S. Wood, pursuant to 28 U.S.C. § 1746, hereby declares as follows in support of the "Motion" referenced in the above caption:

1. I am an adult over the age of 18, a resident of the State of South Carolina, and an attorney with the law firm of Richardson, Patrick, Westbrook & Brickman, LLC ("RPWB"), in Charleston, South Carolina. A copy of RPWB's firm resume can be found at <https://www.rpwb.com/wp-content/uploads/2018/08/RPWB-Firm-Resume-2018.pdf>.

2. I submit this declaration in support of Class Counsel's Motion for Attorneys' Fees and Reimbursement of Expenses, have personal knowledge of all matters asserted herein, and if called to testify, could do so competently.

3. RPWB, together with Class Counsel Carlson Lynch, LLP (“Carlson Lynch”) and Class Counsel The Law Firm of Daniel O. Myers, PLLC (“Myers”), have prosecuted this case on a contingent fee basis without any guarantee of payment for our efforts.

4. Collectively, Carlson Lynch, Myers, and RPWB have investigated the factual and legal bases for this class action, responded to a motion to dismiss, briefed class certification, conducted discovery, engaged in multiple mediations in New York City and Detroit and additional negotiations, and worked with Bonnier’s counsel to finalize the terms of settlement and to implement notice to the class.

5. To date, and throughout the investigatory, litigation, and settlement processes, RPWB has expended 356.5 hours for a total lodestar of \$226,260. This total does not include time spent preparing this declaration and the accompanying motion, or compiling time and expense records.

6. Set forth below on an hourly basis are my firm’s legal services rendered on behalf of the class in this case and the lodestar value of those services. This is a summary indicating the amount of time spent by myself, an associate, and a paralegal of my firm who were involved in this litigation, and the lodestar calculations are based on my firm’s current rates for matters of this type.

Attorney	Experience	Hours	Rate	Total Fee
Robert S. Wood	Member - 20	292.9	\$700.00	\$204,540
D. Charles Dukes	Associate - 6	40.6	\$450.00	\$18,270
William King	Paralegal	23.0	\$150.00	\$3,450

7. In addition to the time already expended, I anticipate incurring additional hours during the final approval process and settlement administration.

8. Additionally, RPWB has reasonably incurred \$3,688.65 in expenses during this litigation. The majority of these expenses (\$2,947.75) relate to attendance and participation in the mediations in New York City and Detroit. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and represent an accurate recordation of the expenses incurred.

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

Executed this September 3, 2019, Mount Pleasant, South Carolina.

Dated: September 3, 2019

/s/ Robert S. Wood
 Robert S. Wood, Esq.
 Richardson, Patrick, Westbrook & Brickman, LLC
 1037 Chuck Dawley Blvd., Bldg. A
 Mount Pleasant, South Carolina 29464