

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In Re: LIQUID ALUMINUM SULFATE
ANTITRUST LITIGATION

Civil Action No. 16-md-2687 (JLL) (JAD)

**DECLARATION OF
MATT KEIL
IN SUPPORT OF APPLICATION
FOR ATTORNEYS' FEES**

I, Matt Keil, declare as follows:

1. I am a partner of the law firm of Keil & Goodson P.A. ("K&G"), local counsel for Plaintiff City of Texarkana, Arkansas and City of Texarkana, Texas d/b/a Texarkana Water Utilities ("Texarkana"). In such capacity, I am fully familiar with the facts contained herein based upon my personal knowledge and the books and records kept in the ordinary course of K&G's business. I submit this declaration in support of Interim DPP Lead Counsel's application for an award of attorneys' fees in the above-captioned action (the "Action"), as well as for reimbursement of expenses incurred in connection with the Action.

2. My firm serves as local counsel for Plaintiff City of Texarkana, Arkansas and City of Texarkana, Texas d/b/a Texarkana Water Utilities and in such capacity we have acted as liaison with KTMC in the preparation, review of documents and pleadings, compilation and coordination and production of discovery in this matter.

3. Additionally, my firm has worked with our local water utilities (Texarkana) in keeping them apprised of the litigation and have appeared at City Council meetings seeking Council approval on proposed settlements.

4. The schedule attached hereto as Exhibit 1 is a summary indicating the amount of time spent by attorneys and professional support staff employees of my firm who were involved in the Action, and the lodestar calculation for those individuals based on my firm's current

hourly rates. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm, which are available at the request of the Court. No time expended on the application for fees and expenses has been included.

5. The hourly rates for the attorneys and professional support staff in my firm included in Exhibit 1 are their standard rates, in complex class action and antitrust litigation.

6. The total number of hours reflected in Exhibit 1 (i.e., time expended on this Action from May 1, 2016 through February 28, 2019) is 105.70. The total lodestar reflected in Exhibit 1 is \$81,917.50 for attorneys' time.

7. My firm has not incurred any travel or expert witness fees and expenses other than copying fee that are de minimis at this time and therefore no expenses are submitted herein.

8. With respect to the standing of my firm, attached hereto as Exhibit 2 is a brief biography of my firm.

I hereby declare under penalty of perjury that the foregoing facts are true and correct.



MATT KEIL

Dated: March 22, 2019

EXHIBIT 1

In Re: Liquid Aluminum Sulfate Antitrust Litigation
Civil Action No. 16-md-2687 (JLL) (JAD)

KEIL & GOODSON P.A.

TIME REPORT

May 1, 2016 through and including February 28, 2019

NAME	HOURS	HOURLY RATE	LODESTAR
Partners			
Keil, Matt	74.70	\$775.00	\$57,892.50
Goodson, John	31.00	\$775.00	24,025.00
TOTALS	105.70		\$81,917.50

EXHIBIT 2

In Re: Liquid Aluminum Sulfate Antitrust Litigation
Civil Action No. 16-md-2687 (JLL) (JAD)

KEIL & GOODSON P.A.

FIRM RESUME

KEIL & GOODSON P.A. FIRM RESUME

In 1990 Matt Keil and John C. Goodson formed the firm of Keil & Goodson P.A. in their hometown of Texarkana, Arkansas. The firm's initial focus was on both civil and criminal trial work. The firm initially worked extensively in civil and criminal trial practice where they enjoyed a successful trial practice including several multi-million dollar settlements. Over the past fifteen years the firm has shifted its focus to complex civil litigation. These areas include consumer class actions, anti-trust litigation, patent litigation, securities fraud litigation and states attorney general actions. The firm still prides itself in being composed of a couple of small town street lawyers from Southwest Arkansas.

Attorneys:

Matt Keil, born in Anchorage, Alaska, is a named partner in the firm, Matt is admitted to practice in all state courts in Arkansas and Texas, the United States District Courts for the Western and Eastern Districts of Arkansas, the Eastern District of Texas and the U.S. Ct. of Appeals for the Eighth Circuit. Mr. Keil is a graduate of the University of Arkansas (B.A. 1981) and University of Arkansas School of Law (J.D. 1986). Mr. Keil is a member of the Texas, Arkansas and Texarkana Bar Associations. He is also a member of the American Board of Trial Advocates, East Texas Chapter. **Email:** mkeil@kglawfirm.com

John C. Goodson, born in Texarkana, Arkansas, is a named partner in the firm, John is admitted to practice in all state courts in Arkansas, the United States District Courts for the Western and Eastern Districts of Arkansas and the U.S. Court of Appeals for the Eighth Circuit. Mr. Goodson is a graduate of the University of Arkansas (B.A. 1987) and University of Arkansas School of Law (J.D. 1989). Mr. Goodson is a member of the Texarkana Southwest Arkansas and Arkansas Bar Associations. **Email:** jcgoodson@kglawfirm.com

Case History:

Keil & Goodson P.A. was involved as co-lead counsel in representing a nationwide class action on behalf of clients of certain accounting firms in Arkansas State Court styled *Warmack-Muskogee vs Pricewaterhouse Cooper, et al* Civil Action No. CV-01-504-3. Through that litigation, the class alleged that these accounting firms overcharged their clients for costs and expenses paid to travel vendors by billing their clients the full face amounts of these costs while, at the same time, receiving back-end rebates, incentives, commissions, and other compensations. As a result of the litigation, class counsel obtained settlements in the total amount of \$108,000,000. These settlements further implemented significant corporate governance changes, which prohibited these accounting firms from engaging in this offensive conduct in the future and from coordinating their travel program with that of any other accounting firm. These settlements have received final approval.

Keil & Goodson P.A. was also co-lead counsel which successfully represented a nationwide class against Google, Inc. in the State Court of Miller County, Arkansas. The case gained national recognition in its successful efforts to protect advertising clients from "click

fraud” from their internet provider Google, Inc. As a result of this litigation a settlement which received final approval in the amount of \$90,000,000 was obtained.

Keil & Goodson P.A. as co lead counsel also helped resolve the following class action cases: *Beasley, et al vs Reliable Insurance, et al*, CV-05-058, *Larry Berry , et al vs Titeflex Corporation, et al*, CV-04-211(Clark County Arkansas), *Anthony Hunsucker, et al vs American Standard Insurance Company of Wisconsin, et al*, CV-07-155, *Glenn Gross, et al vs Atlantic Lloyds Insurance Company of Texas, et al* CV-07-374, *Tom Simental vs California State Automobile Association, et al*, CV-07-359, *Bonnie Johnson, et al vs Clarendon American Insurance Company, et al*, CV-07-138, *Gary White, et al vs American Casualty Company of Reading PA, et al* CV-07-419, *Martha Hogue, et al vs Federated Mutual Insurance Company, et al*, CV-07-267, *Lorene Atkinson, et al vs General Casualty Company of Wisconsin, et al*, CV-07-126, *Martha Sweeten, et al vs American Empire Insurance Company, et al*, CV-07-154, *George Zarebski, et al vs Hartford Insurance Company of the Midwest, et al*, CV-06-409-3, *Phyllis Gibson, et al vs Hanover Insurance Company, et al*, CV-07-429, *Kathern Pizarro, et al vs Horace Mann Insurance Company, et al*, CV-07-428, *Glenn Gross vs Insurance Company of the West, et al*, CV-07-358, *Erlinda Soto, et al vs AAA Mid-Atlantic Insurance Company of New Jersey, et al* CV-07-368, *Sylvia Webb, et al vs The First Liberty Insurance Corporation, et al*, CV-07-418, *Craig Gooding, et al vs Grange Indemnity Insurance Company, et al* CV-07-456, *Victoria Jones vs American Hardware Mutual Insurance Company, et al* CV- 07-470, *Sheila Frugia, et al vs Allied P&C Insurance Company, et al*, CV-07-417, *Dusty Easley, et al vs Ohio Casualty Insurance Company, et al*, CV-07-139, *Jessica Parker, et al vs Mountain Laurel Assurance Company, et al*, CV-07-415, *Glenn Gross, et al vs W.R. Berkley Corporation, et al*, CV-07-264, *Chad Hunter, et al vs American Central Insurance Company, et al*, CV-07-071, *Glenn Gross, et al, vs Graphic Arts Mutual Insurance Company, et al*, CV-07-086, which have resulted in class benefits which have exceeded 1.5 billion dollars.

Keil & Goodson continues to represent clients in complex litigation cases in both Federal and State Courts.