

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

In Re: LIQUID ALUMINUM SULFATE
ANTITRUST LITIGATION

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

DECLARATION OF

**IN SUPPORT OF APPLICATION FOR
ATTORNEY'S FEES AND EXPENSES**

M. Stephen Dampier, Esq. declares as follows:

1. I am the managing shareholder with The Dampier Law Firm, P.C. ("the Firm"), counsel for the Mobile Area Water & Sewer Service ("Mobile"), a class representative, in the above matter. 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 the Firm's business. I submit this declaration in support of Class Counsel's application for an award of attorneys' fees in above-captioned action (the "Action"), as well as for reimbursement of expenses incurred by the Firm in connection with the Action.

2. The Firm served as co-counsel for Mobile in this Action. The Firm was involved in the Action as one of the law firms assigned certain specific duties by Lead Counsel and other members of the Steering Committee as co-counsel in (a) vetting the class representative and reviewing LAS bid documents; (b) working with Mobile to accurately and fully respond to Rule 26 Initial Disclosures; (c) implementing a litigation hold and overseeing document preservation for both ESI and hard documents in central files and with custodians, respectively; (e) determining custodians and non-custodians for purposes of responding to Defendants' discovery requests; (f) handling the certificate of compliance; (g) overseeing ESI collection and production from central computer systems, back-up electronic tapes and files, and custodians over many

years containing different types of hardware and software; (h) overseeing collection and production of relevant hard documents from central files and custodians; (i) vetting ESI vendors and overseeing same in the collection of relevant, non-burdensome ESI to produce; (j) researching and overseeing issues concerning burdensome and inaccessible ESI; (k) determining and overseeing the ESI and hard documents to produce pursuant to Defendants' Requests for Production; (l) participating in responding to Defendants' Interrogatories to Mobile; (m) acquiring and reviewing all retention policies in connection with ESI and hard documents in central files and with custodians; (n) responding to numerous follow-up questions from Defendants in connection with initial disclosures, requests for production, and interrogatories; (o) keeping the class representative informed on numerous developments in the litigation, including settlements, and (p) in general responding to all discovery issues in connection with Mobile and performing other duties in connection with the Named Plaintiffs.

3. The Firm primarily worked with or took direction from James Cecchi at Carella Byrne Cecchi Olsteim, Brody & Agnello, P.C.; Linda Nussbaum, Hugh Sandler and Peter Moran at the Nussbaum Law Group, P.C.; and Janet Evans at Gray Plant Mooty.

4. The schedule attached hereto as Exhibit 1 is a summary indicating the amount of time spent by each attorney and professional support staff employee of the Firm's who was involved in the Action, and the lodestar calculation based on the Firm's current billing rates. For personnel who are no longer employed by the Firm, the lodestar calculation is based upon the billing rates for such personnel in his or her final year of employment by the Firm. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by the Firm, which are available at the request of the Court. Time expended in preparing this application for fees and reimbursement of expenses has not been included in this request. In

addition, time expended prior to April 2016 (amounting to 118.20 hours and a lodestar of \$64,975.00, respectively) is excluded from this declaration and the fee application.

5. The hourly rates for the attorneys and professional support staff in the Firm included in Exhibit 1 are the same as the regular rates that would be charged for their services in non-contingent matters and/or which have been accepted in other antitrust litigation.

6. The total number of hours expended on this Action by the Firm during the Time Period is 216.40. The total lodestar for my firm for that period is \$125,979.00, consisting of \$125,716.50 for attorney's time and \$262.50 for professional support staff time.

7. The Firm's lodestar figures are based upon the Firm's billing rates, which do not include charges for expense items. Expense items are billed separately, and such charges are not duplicated in the Firm's billing rates.

8. As detailed in the schedule attached hereto as Exhibit 2, the Firm has incurred a total of \$3,068.78 in unreimbursed expenses in connection with the prosecution of this Action.

9. The expenses incurred in this Action are reflected on the books and records of the Firm. These books and records are prepared from expense vouchers, check records and other source materials and are an accurate record of the expenses incurred.

10. With respect to the standing of the Firm, attached hereto as Exhibit 3 is a brief biography of my firm and attorneys in my firm who were principally involved in this Action.

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

Dated: March 20, 2019



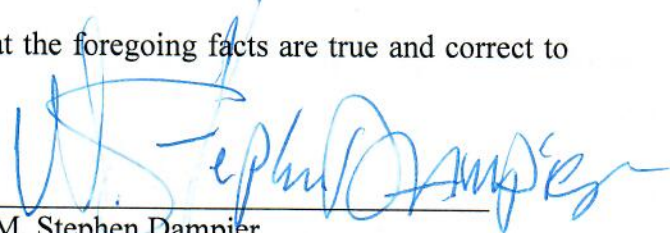

M. Stephen Dampier

Exhibit 1

In Re Liquid Aluminum Sulfate Antitrust Litigation

Firm Name: The Dampier Law Firm, P.C.

Reporting Period: April 1, 2016 through February 28, 2019

| Name | Title | Current Hourly Rate | Cumulative Hours | Cumulative Lodestar |
|--------------------|--------------|--------------------------------|-----------------------------|--------------------------------|
| M. Stephen Dampier | (P) | \$585.00 | 214.9 | \$125,716.50 |
| Samantha Fincher | (PL) | \$175.00 | 1.5 | \$262.50 |
| | | | | |
| TOTALS | | | 216.4 | \$125,979.00 |

Partner (P)

Of Counsel (OC)

Associate (A)

Paralegal (PL)

Exhibit 2

In Re Liquid Aluminum Sulfate Antitrust Litigation

Firm Name:

Reporting Period: April 1, 2016 through February 28, 2019

| Disbursement | Amount |
|---------------------|-------------------|
| ESI Vendor | \$2,243.68 |
| Mileage | \$243.10 |
| Court Costs | \$574.00 |
| TOTAL | \$3,060.78 |

Exhibit 3

BRIEF BIOGRAPHY

The Firm

The Dampier Law Firm, P.C. is a boutique litigation firm founded in 1995. The firm specializes in complex litigation and individual actions on behalf of individuals and businesses. The firm has acted as Co-Lead Class Counsel and Class Counsel in numerous complex actions, as well as individual cases, and has participated in the recovery of hundreds of millions of dollars for individuals and businesses that have been injured or wronged.

M. Stephen Dampier – Founder and Senior Member. Mr. Dampier graduated from The George Washington University (Accounting), Samford University's Cumberland School of Law (J.D.) and the New York University School of Law (LL.M.) in 1983, 1990 and 1991, respectively. He is licensed to practice law in Alabama, Colorado and Washington, D.C., maintaining a nationwide practice in complex litigation. Since 1994, Mr. Dampier has served as Co-lead Counsel or Class Counsel in numerous class actions and participated in the aforementioned recoveries on behalf of class members. Some representative class actions include: *Foster v. ABTCO* (Hardboard Siding Class Action) (Circuit Court, Choctaw County, AL); *In Re Aftermarket Filters Antitrust Litigation* (USDC NDIL); *In Re Autolights Antitrust Litigation* (USDC CDCA); *In Re Blood Reagents Antitrust Litigation* (USDC EDPA); *In Re Flat Glass Antitrust Litigation* (USDC WDPA); *Lucken v. Ultra Resources, Inc.* (Natural Gas Royalty Litigation) (USDC CO); *In Re Marine Hose Antitrust Litigation* (USDC SDFL); *In Re Potash Antitrust Litigation* (USDC NDIL); *Thorpe v. State of Colorado* (Constitutional and Tax Litigation) (District Court, City and County of Denver, CO); *Anderson v. Merit Energy Company* (Natural Gas Royalty Litigation) (USDC CO); *Moye v. Exxon Mobil Corporation* (Natural Gas Royalty Litigation) (Monroe County Circuit Court, AL); *Holman v. Kerr-McGee Rocky Mountain Corporation* (Natural Gas Royalty Litigation) (District Court, Weld County, Colorado); *In Re Polyurethane Foam Antitrust Litigation* (USDC NDOH); *In re Photochromics Lens Antitrust Litigation* (USDC MDFL); *Holman v. Patina Oil & Gas Corporation* (Natural Gas Royalty Litigation) (District Court, Weld County, CO); *Frazier v. Unocal* (Natural Gas Royalty Litigation) (District Court, Midland, TX); *McGowin v. Texaco* (Natural Gas Royalty Litigation) (Circuit Court, Mobile County, AL); *McNeil & Sons, Inc. v. Unocal* (Natural Gas Royalty Litigation) (Circuit Court, Mobile County, AL); *Johnson v. Heilig-Meyers Corporation* (Breach of Contract) (Choctaw County, AL); *Wardell Family Limited Partnership v. Noble Energy, Inc.*, (Natural Gas Royalty Litigation) (District Court, Weld County, Colorado); *Williams v. Phillips Petroleum Company* (Natural Gas Royalty Litigation) (Circuit Court, Washington County, AL); *Heffner v. BCBS of Alabama* (ERISA) (USDC MDGA); *Chamberlin v. BCBS of Alabama* (ERISA) (USDC SDAL); *Holman v. Petro-Canada* (Natural Gas Royalty Litigation) (USDC CO); *Droegemuller v. Petroleum Development Corporation* (Natural Gas Royalty Litigation) (USDC CO); and *Davis v. Department of Revenue, Commonwealth of Kentucky* (Constitutional and Municipal Bond Tax Litigation) (U.S. Supreme Court). Mr. Dampier is admitted to practice in virtually all state and federal courts in Alabama, Colorado and Washington, D.C., including the U.S. District Courts for the Northern, Middle and Southern

Districts of Alabama; The U.S. District Court, District of Columbia; U.S. District Court, District of Colorado; District of Columbia, Court of Appeals; 11th Circuit, Court of Appeals; and the U.S. Supreme Court. He also has served on numerous public and private boards, including the Royalty Policy Committee, U.S Department of Interior, State of Alabama Oil & Gas Board; and the State Health Coordinating Council.

John A. Ioannou – Of Counsel. Mr. Ioannou graduated from St. John's University in 1991 and 1994, earning his B.S. (Finance) and Juris Doctorate degrees, respectively. He is an experienced litigator, including substantial litigation experience with Motley Rice, LLC, Pomerantz, LLP, and the Office of the New York State Attorney General. Mr. Ioannou has worked on complex cases in virtually all phases, including developing and investigating new matters; case coordination, management and strategy. He has conducted complex investigations and litigation concerning wrongful conduct by multi-national corporations. In addition, he has litigated federal and state matters in many courts; engaged in case strategy and expert coordination; substantial trial motion and appellate practice; discovery, substantial document review and e-discovery experience; settlement negotiation, mediation, approval, and administration. He is experienced in many types of investigations; drafting, issuing and enforcing subpoenas and taking investigatory statements and informational interviews.