

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

HILARY REMIJAS and JOANNE KAO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

THE NEIMAN MARCUS GROUP, LLC, a
Delaware limited liability company,

Defendant.

Case No. 1:14-cv-01735

Hon. Sharon Johnson Coleman

**SUPPLEMENTAL DECLARATION OF JOHN YANCHUNIS IN SUPPORT OF
MOTIONS FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND FOR
ATTORNEYS' FEES**

I, John A. Yanchunis, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I lead the National Consumer Class Action section of Morgan & Morgan's Complex Litigation Group.

2. This declaration is being submitted to further support of the motion for attorneys' fees, costs and expenses filed previously by my firm. The declaration supports the professional time, costs and expenses incurred by in this matter since the date of the original submission, August 21, 2017, to present, and presents the additional time and expenses incurred since my prior declaration concerning fees and expenses incurred in connection with this matter, filed August 21, 2017 (Dkt. 161). The declaration does not cover, of course, the additional labor which will be required post settlement, including the time to respond to calls and inquiries from Class members which continue to date, and any additional services which might be required after this date with regards to the administration of the settlement, including if necessary, the defense of the Court's Final Judgment on appeal if any are taken.

3. A detailed summary indicating the amount of time expended by the partners, associates, and professional support staff of my firm who were involved in this litigation is set forth below:

Attorney	Rate	Time	Amount
JAY	950	45.0	\$42,750.00
PAB	658	0.7	\$460.60
JC	202	0.6	\$121.20
TOTAL			\$43,331.80

4. In addition, our firm incurred an additional \$4,024.52 in expenses.

5. Of course, should the Court have any questions about the rate for any of the professionals who worked on this matter, I am available to answer them and provide examples where other Federal Courts have awarded fees to this firm.

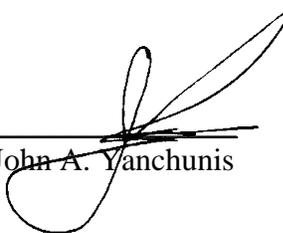
6. Based upon my firm's investigation, research, information review, interviews, as well as my personal knowledge and experience, I believe that the Settlement is in the best interests of the Class and that the Settlement is fair, reasonable, and adequate. The benefits afforded by the Settlement reflect a reasoned compromise which not only takes into consideration the risks inherent in all complex, class litigation, but also the various issues in this case specifically, which had the potential to completely eliminate recovery available to the Class.

7. While I believe that the claims asserted in this action have merit and that the evidence developed to date supports those claims, I also recognize and acknowledge, based on my experience, the expense and length of time necessary to prosecute this case to judgment. I have also taken into account the uncertain outcome and the risk of any litigation, as well as the difficulties and delays inherent in such litigation.

8. I further believe that the request of \$530,000 to cover Plaintiffs' counsel's fees and expenses is modest in relation to the actual costs incurred litigating this matter.

9. Plaintiffs and the Settlement Class members have waited years to receive compensation, if at all, and would have had to wait more years had the case proceeded through trial and appeal. The class would be exposed to the attendant risks of litigation, including the uncertainties and difficulties pertaining to a disputed class certification proceeding, a likely summary judgment motion, the length of time necessary to see this matter through to trial, the uncertainties of the outcome of the litigation, and the likelihood that resolution of the class claims, whenever and however determined, would be appealed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed May 1, 2020 in Tampa, Florida.

By: 
John A. Yanchunis