

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

GAYL JACKSON, *et al.*

Plaintiffs

v.

VIKING GROUP, INC., *et al.*

Defendants.

Civil Action No. 8:18-cv-02356-PJM

**DECLARATION OF JAMES P. ULWICK IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, EXPENSES AND SERVICE AWARDS**

I, James P. Ulwick, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a member in good standing of the bar of the State of Maryland, and am counsel for Plaintiffs and the Settlement Class. I respectfully submit this declaration in further support of Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards. The following is based on my personal knowledge, and if called upon to do so, I could and would competently testify to the statements set forth below.

2. I am a member of the law firm of Kramon & Graham, P.A. in Baltimore, Maryland. I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees, Expenses, and Incentive Awards.

3. I am a Fellow in the American College of Trial Lawyers, and a permanent member of the Judicial Council for the United States Court of Appeals for the Fourth Circuit. I have been listed in "Best Lawyers in America" every year since 1993 in multiple categories, and was named Baltimore "Lawyer of the Year" in 2019 for one of those categories. I have been

listed every year in Maryland *SuperLawyers* since the inception of that publication. I have also been recognized in the top tier of Maryland lawyers in *Chambers USA* every year since 2006.

4. I have an extensive background in class action litigation on behalf of both plaintiffs and defendants. Recently, I was selected by United States District Judge Paul Grimm to serve as one of two liaison counsel in *In Re: Marriott International, Inc., Customer Data Security Breach Litigation*. I was also appointed by Maryland Circuit Judge Ronald Rubin to serve as defendants' class counsel on behalf of 511 companies in the only defense class ever certified in Maryland. My experience, along with the experience of my co-counsel, has allowed our firms to take on this matter and to successfully meet the resources of Defendants and their capable and experienced counsel.

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5. As of May 1, 2020, my firm has spent approximately 190 hours working on this case, for a total lodestar amount of \$89,647.50.

6. The hourly rates of Kramon & Graham attorneys ranged from \$225 per hour for associate work, and \$650 per hour for partner work.

7. Due to the amount of privileged information contained in the hourly billing records, those detailed records are not attached here, but can be provided in camera should this Court wish to review them.

8. Class Counsel made significant efforts toward the efficient allocation of work between them. Partners in the firms coordinated their work assignments on a regular basis to prevent unnecessary duplication of work across the firms.

9. Having the firms serving as Class Counsel work on the case together added substantial value to the case, as borne out by the ultimate relief achieved for the Class. Class

Counsel were able to work together to develop sophisticated and effective strategies for pursuing the claims of Plaintiffs and the Classes.

10. Moreover, the arrangement between the Class Counsel firms also reflects the reality of large consumer protection class actions where, because of the great risk involved, multiple firms work together to spread the risk.

11. The work performed in this case was reasonable and necessary to the prosecution and settlement of this case. Class Counsel conducted a significant factual investigation during the prosecution of this action. Because of their comprehensive evaluation of the facts and law, Class Counsel was able to settle this case on very advantageous terms for the Class. Class Counsel provided Class Members with substantive and certain relief much sooner than if litigation of this matter had continued.

12. As settlement administration is ongoing, and based on my experience in previous consumer protection class actions, the lodestar figures reported herein will meaningfully increase by the time the settlement is completely and finally administered.

COUNSEL'S EXPENSES

13. This litigation required Class Counsel to advance costs. As of May 1, 2020, my firm has expended costs of approximately \$1,520.25. These expenses are reflected in the books and records of my firm. These books and records are prepared from expense vouchers and check records and are an accurate record of the expenses incurred. All of the expenses incurred were reasonable and necessary to the prosecution of this case.

14. On behalf of Plaintiffs and all counsel in this litigation, I respectfully request that the Court award the requested attorneys' fees and costs.

I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct.

Dated: May 22, 2020

/s/ James P. Ulwick
James P. Ulwick