

## UNITED STATES DISTRICT COURT DISTRICT OF NORTHERN DISTRICT OF ALABAMA NORTHEASTERN DIVISION

HEATHER LESLIE, on behalf of herself

and all others similarly situated,

Case No. 5:20-cv-00629-LCB

Plaintiff,

v.

REDSTONE FEDERAL CREDIT UNION,

Defendant.

## DECLARATION OF ARTHUR STOCK IN SUPPORT OF PLAINTIFFS' MOTION FOR PAYMENT OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

I, Arthur Stock, am an attorney at Milberg Bryson Coleman Phillips Grossman PLLC, Counsel for Plaintiffs in this Action. I have been admitted to practice *pro hac* in this Action, and I have participated in this litigation. I submit this Declaration in support of Plaintiff's Motion for Payment of Attorneys' Fees and Reimbursement of Expenses for based on my personal knowledge. I hereby declare:

1. Exhibit A attached hereto is the firm resume of Milberg Bryson Coleman Phillips Grossman PLLC, and the resumes of the attorneys with greatest involvement in this case, Arthur Stock and Ryan McMillan.

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2. All firm timekeepers record their time contemporaneously as it is incurred on software designed to capture billed time down to one-tenth of an hour. Out lodestar represents 173.9 attorney hours and 21.1 paralegal hours billed on this matter.

Timekeeper	position	Hours	Rate	Total
Arthur Stock	partner	51.4	\$997	\$51,245.80
Ryan McMillan	senior counsel	114.4	\$676	\$77,334.40
Lisa White	former partner	5.3	\$759	\$4,022.70
Vince Carnevale	partner	2.8	\$764	\$2,139.20
Dawn Holt	senior paralegal	5.4	\$250	\$1,350.00
Cathy Bryant	senior paralegal	6.6	\$225	\$1,485.00
Renee Pothier	paralegal	4.4	\$208	\$915.20
Lisa Maxwell	paralegal	4.7	\$208	\$977.60
TOTAL		195		\$139,469.90

3. Expenses incurred by the Milberg Firm in this litigation are broken as

follows:

Expense Category		Amount	
Postage	\$	1.03	
Transcripts / Depositions / Hearing	\$	3,212.60	
Litigation Support	\$	3,499.38	
Out-of-town Travel	\$	244.79	
Data Storage	\$	84.63	
Travel Meals	\$	26.09	
TOTAL	\$	7,068.52	

We will provide detailed records upon request.

Executed on this 30 day of June, 2023, at Clarksboro, New Jersey,

By: <u>/s/Arthur Stock</u> Arthur Stock, Esq.

# EXHIBIT A



FIRM RESUME

# WHO WE ARE

Established by members of Milberg Phillips Grossman LLP, Sanders Phillips Grossman LLC, Greg Coleman Law PC, and Whitfield Bryson LLP, the firm represents plaintiffs in the areas of antitrust, securities, financial fraud, consumer protection, automobile emissions claims, defective drugs and devices, environmental litigation, financial and insurance litigation, and cyber law and security.

For over 50 years, Milberg and its affiliates have been protecting victims' rights and have recovered over \$50 billion for our clients. Our attorneys possess a renowned depth of legal expertise, employ the highest ethical and legal standards, and pride ourselves on providing stellar client service. We have repeatedly been recognized as leaders in the plaintiffs' bar and appointed to leadership roles in prominent mass torts and class actions.

Milberg challenges corporate wrongdoing through class action, mass tort, consumer and shareholder rights services, both domestically and globally.

Milberg's previous litigation efforts helped to create a new era of corporate accountability that put big companies on notice. The strategic combination of four leading plaintiffs' firms offers clients expanded capabilities, greater geographical coverage, enhanced financial breadth, and increased operational capacity. It also enables the firm to serve diverse and global clients who are seeking to enforce their rights against well-financed corporations - wherever they operate.

www.milberg.com

# PRACTICE AREAS

## ANTITRUST & COMPETITION LAW

Today, on a global scale, consolidated corporate entities exercise dominating market power, but proper enforcement of antitrust law ensures a fair, competitive marketplace. Milberg prosecutes complex antitrust class actions against large, well-funded corporate defendants in healthcare, technology, agriculture, and manufacturing. Our leading practitioners successfully represent plaintiffs affected by price-fixing, monopolization, monopoly leveraging tying arrangements, exclusive dealing, and refusals to deal. The firm continues aggressively vindicating rights of plaintiffs victimized by antitrust violations, holding companies accountable for anticompetitive behavior.

#### COMPLEX LITIGATION

With 50 years of vetted success, Milberg handles complex, high-stakes cases at any stage of the litigation process. Our attorneys have experience litigating complex cases for businesses and plaintiffs outside of the class action context, including business torts, contract disputes, anti-SLAPP motions, corporations, LLCs, partnerships, real estate, and intellectual property.

#### CONSUMER PRODUCTS

Milberg's consumer litigation group focuses on protecting victims of deceptive marketing and advertising of goods and services, or those who have bought defective products. Our attorneys are experienced in handling a wide array of consumer protection lawsuits, including breach of contract, failure to warn, false or deceptive advertising of goods and services, faulty, dangerous, or defective products, warranty claims and unfair trade practices cases. Milberg has achieved real-world recoveries for clients, often requiring corporations to change the way they do business. Our team of attorneys has extensive experience representing plaintiffs against well-resourced and sophisticated defendants.

#### CONSUMER SERVICES

Consumers have rights, and companies providing consumer services have a legal obligation to abide by contractual agreements made with customers. Companies must also follow state and federal laws that prohibit predatory, deceptive, and unscrupulous business practices. Milberg's Consumer Services litigation group protects consumers whose rights have been violated by improperly charged fees, predatory and discriminatory lending, illegal credit reporting practices, and invasion of privacy. We also enforce consumer rights by upholding The Fair Credit Reporting Act and Telephone Consumer Protection Act.

## CLASS ACTION LAWSUITS

Milberg pioneered federal class action litigation, and is recognized as a leader in defending the rights of victims of corporate and large-scale wrongdoings. We have the manpower, resources, technology, and experience necessary to provide effective representation in nationwide class action lawsuits. Our attorneys have led class actions resulting in settlements of up to billions of dollars across a variety of practice areas, including defective consumer products, pharmaceutical drugs, insurance, securities, antitrust, environmental and toxic torts, consumer protection, and breach of contract.

## DANGEROUS DRUGS & DEVICES

For some patients, medication and medical devices improve their lives. For others, the drugs and equipment have questionable benefits at best, and serious, unintended side effects at worst. Taking on drug and device makers requires a law firm that can stand up to the world's largest, most poweful companies. Our defective drug lawyers have held leadership roles in many national drug and device litigations, recovering billions of dollars in compensation.

## DATA BREACH, CYBERSECURITY & BIOMETRIC DATA LAWSUITS

Technology changes faster than laws regulate it. Staying ahead of legal technical issues requires a law firm that can see the full picture of innovation and apply past lessons to navigate fast-moving developments, putting consumers ahead of corporate interests. Our data breach and privacy lawyers work at the cutting edge of technology and law, creating meaningful checks and balances against technology and the companies that wield it. Cybersecurity threats continue evolving and posing new consumer risks. Milberg will be there every step of the way to protect consumer privacy and hold big companies accountable.

## ENVIRONMENTAL & TOXIC TORTS LITIGATION

Litigation is key in fighting to preserve healthy ecosystems and hold environmental lawbreakers accountable. But in today's globalized world, pollutants—and polluters—are not always local. Corporations have expanded their reach and ability to cause harm. Our environmental litigation practice focuses on representing clients in mass torts, class actions, multi-district litigation, regulatory enforcement, citizen suits, and other complex environmental and toxic tort matters. The companies involved in harmful environmental practices are large, wealthy, and globally influential, but as an internationally recognized plaintiffs' firm, Milberg has the strength and resources to present clients seeking to enforce their environmental rights against well-financed corporations—wherever they operation.

## FINANCE & INSURANCE LITIGATION

Big banks and public insurance firms are obligated by their corporate charters to put shareholders' interests ahead of client interests. However, that doesn't mean they can deceive clients to profit at their expense. Milberg's attorneys handle hundreds of insurance-related disputes, including first party bad faith insurance cases, business interruption cases, and hurricane insurance cases. As one of the nation's stop class action law firms, we are well-positioned to pursue insurance bad faith cases on a statewide or nationwide basis.

## PUBLIC CLIENT REPRESENTATION

The ability of governments to serve and protect their residents is often threatened by the combination of lower revenues and rising costs. Budget shortfalls are increasing in part because private companies externalize costs, but while corporate profits grow, public interest pays the price. Effectuating meaningful change through litigation, Milberg partners with state and local governments to address the harms facing its residents. Internationally, Milberg's Public Client Practice has achieved success against global powerhouse corporations, including drug, tobacco, mining, and oil and gas companies.

## SECURITIES LITIGATION

Over 50 years ago, Milberg pioneered litigation claims involving investment products, securities, and the banking industry by using class action lawsuits. Our litigation set the standard for case theories, organization, discovery, methods of settlement, and amounts recovered for clients. Milberg continues to aggressively pursue these cases on behalf of institutional and individual investors harmed by financial wrongdoing. Inventors of securities class actions, Milberg has decades of experience holding companies accountable both in the United States and globally.

## WHISTLEBLOWER & QUI TAM

Blowing the whistle on illegal or unethical conducted is a form of legally protected speech. Milberg's whistleblower attorneys have led actions that returned hundreds of millions of dollars in ill-gotten gains, resulting in significant awards of our clients. Our legacy of standing up to corporate power extends to advocating for greater transparency. In addition to representing whistleblowers, we fight back against corporate-backed laws seeking to deter them from making disclosures.

"Scoring impressive victories against companies guilty of outrageous behavior."

- FORBES

"A powerhouse that compelled miscreant and recalcitrant businesses to pay billions of dollars to aggrieved shareholders and customers." - NEW YORK TIMES

# LEADERSHIP ROLES

In re: Google Play Consumer Antitrust Litigation, 20-CV-05761 (N.D. Cal.) In re: Elmiron (Pentosan Polysulfate Sodium) Products Liability Litigation MDL No. 2973 In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices & Products Liability Litigation In re: Blackbaud Data Privacy MDL No. 2972 In re: Paragard IUD Products Liability Litigation MDL No. 2974 In re: Seresto Flea & Tick Collar, Marketing Sales Practices & Product Liability Litigation MDL No. 3009 In re: All-Clad Metalcrafters, LLC, Cookware Marketing and Sales Practices Litigation In re: Allergan Biocell Textured Breast Implant Product Liability Litigation In re: Zicam In re: Mirena In re: Incretin In re: Guidant Corp. Implantable Defibrillators In re: Ortho Evra In re: Reglan In re: Yaz In re: Levaquin Litigation In re: Kugel Mesh In re: Zimmer Nexgen Knee In re: Medtronic Sprint Fidelis Leads In re: Fresenius Granuflo In re: Stand 'N Seal In re: Propecia In re: Chantix In re: Transvaginal Mesh

- In re: Fosamax
- In re: Olmesartan (Benicar)
- In re: Onglyza (Saxagliptin) And Kombiglyze XR
- In re: Risperdal and Invega Product Liability Cases
- In re: Fluoroquinolones
- In re: Depuy Pinnacle
- In re: Recalled Abbott Baby Formula

# NOTABLE RECOVERIES

\$3.2 Billion Settlement - In re: Tyco International Ltd., Securities Litigation, MDL 1335 (D.N.H.)

\$4 Billion Settlement - In re: Prudential Insurance Co. Sales Practice Litigation, No. 95-4704 (D.N.J.)

\$1.14 Billion Settlement - In Re: Nortel Networks Corp. Securities Litigation, No. 01-1855 (S.D.N.Y.)

\$1 Billion-plus Trial Verdict - Vivendi Universal, S.A. Securities Litigation

\$1 Billion Settlement - NASDAQ Market-Makers Antitrust Litigation

\$1 Billion Settlement - W.R. Grace & Co.

- \$1 Billion-plus Settlement Merck & Co., Inc. Securities Litigation
- \$775 Million Settlement Washington Public Power Supply System Securities Litigation

# LOCATIONS

#### CALIFORNIA

280 South Beverly Drive, Penthouse Beverly Hills, California 90212

402 West Broadway, Suite 1760 San Diego, California 92101

FLORIDA 2701 South Le Jeune Road Coral Gables, Florida 33134

ILLINOIS 227 W. Monroe Street, Suite 2100 Chicago, Illinois 60606

KENTUCKY 19 North Main Street Madisonville, Kentucky 42431

LOUISIANA 5301 Canal Boulevard New Orleans, Louisiana 70124

MICHIGAN 6905 Telegraph Road, Suite 115 Bloomfield Hills, Michigan 48301

NEW JERSEY 1 Bridge Plaza North, Suite 275 Fort Lee, New Jersey 07024

NEW YORK 100 Garden City Plaza, Garden City New York 11530

405 E 50th Street New York 10022 NORTH CAROLINA

900 West Morgan Street Raleigh, North Carolina 27603

SOUTH CAROLINA 825 Lowcountry Blvd, Suite 101 Mount Pleasant, South Carolina 29464

TENNESSEE 800 S. Gay Street, Suite 1100 Knoxville, Tennessee 37929

518 Monroe Street Nashville, Tennessee 37208

## PUERTO RICO

1311 Avenida Juan Ponce de León San Juan, Puerto Rico 00907

WASHINGTON 1420 Fifth Ave, Suite 2200 Seattle, Washington 98101

17410 133rd Avenue, Suite 301 Woodinville, Washington 98072

#### WASHINGTON, D.C.

5335 Wisconsin Avenue NW, Suite 440 Washington, D.C. 20015-2052

NETHERLANDS

GERMANY

PORTUGAL

UNITED KINGDOM



www.milberg.com



**Arthur Stock** is a Partner at Milberg with 30 years of litigation experience. Throughout his career, Mr. Stock has represented plaintiffs in antitrust, commercial, financial, securities, and consumer class actions.

Prior to joining Milberg, Mr. Stock was a principal litigator in numerous class actions, including: *Merrill Lynch Inc. Securities Litigation* (S.D.N.Y.), which resulted in a \$475 million settlement on behalf of investors in Merrill Lynch securities; *Lee v. Enterprise Leasing Co.* (D. Nev.), in which class members recovered 80% of damages from allegedly illegal charges regarding Nevada airport car rentals; and *Vasco v. PHRG*, where class members recovered \$5.2 million from a business that allegedly placed telemarketing calls to consumers without prior express consent.

Mr. Stock is a graduate of Yale University (B.A. with distinction in economics) and the Duke University School of Law (J.D. with high honors), where he served as Articles Editor of the Duke Law Journal. Before entering private practice, he served as a Law Clerk to the Honorable Jackson L. Kiser, United States District Court of the Western District of Virginia.

## Mr. Stock's recent class action settlements include:

- Parry v. Farmers Insurance, Los Angeles County Super. Ct. (2022) **\$90 million** settlement for class of insurance agents for unreimbursed business expenses
- *Glascock v. Serco, Inc.,* (E.D. Va. 2021) **\$1.2 million** settlement for class of pension fund participants
- White v. Members 1st Federal Credit Union (M.D. Pa. 2020) \$1.08 million settlement for class of individuals charged bank overdraft fees

## Mr. Stock's Representative Reported Decisions include:

- Lussoro v. Ocean Financial Federal Credit Union, 456 F. Supp. 3d 474 (E.D.N.Y. 2020)
   sustaining Complaint in class action alleging unlawful overdraft charges by credit union
- Richardson v. Verde Energy USA, Inc., 354 F.Supp.3d 639 (E.D. Pa. 2018), and 2016
  WL 7380708 (E.D. Pa. Dec. 19, 2016) sustaining Complaint and partially denying summary judgment in class action against alleged robocaller
- Chapman v. Tristar Products, Inc., 2018 WL 4203533 (N.D. Ohio Sept. 14, 2018), and 2018 WL 3752228 (N.D. Ohio Aug. 3, 2018), and 2017 WL 1433259 (N.D. Ohio April 24, 2017) – granting class certification, approving extended warranty and coupon settlement, and denying intervention to non-party objecting to settlement, in consumer class action for allegedly defective pressure cookers
- Lee v. Enterprise Leasing Co.-West, 2015 WL 2345540 (D. Nev. May 15, 2015), and 300 F.R.D. 466 (D. Nev. 2014), and 30 F.Supp.3d 1002 (D. Nev. 2014) granting plaintiffs' motions for summary judgment, class certification, and approval of settlement, in consumer class action alleging overcharges on airport car rentals

## **Practice Areas**

Antitrust & Competition Law Class Action Lawsuits Complex Litigation Finance & Insurance Litigation Securities Litigation

# **Education**

B.A., Yale University J.D., Duke University School of Law

# **Bar Admissions**

State Courts of New Jersey State Courts of North Carolina State Courts of Pennsylvania State Courts of Tennessee United States Court of Appeals for the Seventh Circuit United States Court of Appeals for the Ninth Circuit United States District Court for the District of Colorado United States District Court for the Eastern District of Pennsylvania United States Tax Court



Ryan P. McMillan Senior Counsel

**Ryan McMillan** is a Senior Counsel at Milberg where he represents plaintiffs primarily in class action and complex litigation cases involving fair lending discrimination, contract law, business torts, automotive defects, ERISA, and consumer protection. Mr. McMillan also represents pro bono clients seeking conservatorships in Knoxville and surrounding counties.

A native of East Tennessee, Mr. McMillan attended the University of Mary Washington where he graduated with a Bachelor's Degree, cum laude, in History. Mr. McMillan received his J.D. from the University of Tennessee College of Law in 2010. While attending law school, he was a staff editor for the Tennessee Journal of Law and Policy and received the Patrick L. Hardin Award for Excellence in Employment and Labor Law.

From 2012 to 2019, Mr. McMillan represented thousands of disabled clients in Social Security Disability hearings as an attorney for Dale Buchanan and Associates in Chattanooga and Knoxville, Tennessee.

In 2019, Mr. McMillan joined Greg Coleman Law (later Milberg) to continue his work in representing plaintiffs. Through his role, Mr. McMillan is a strong advocate for the underserved in East Tennessee. Legal Aide of East Tennessee named Milberg "Pro Bono Firm of the Year" in 2022 as a result of his efforts.

Mr. McMillan lives in Alcoa, Tennessee with his wife, Rachel, and three children, Oliver, Miles, and Maeve. In his free time, Mr. McMillan enjoys spending time with his family and visiting the Smokey Mountains.

# Practice Areas

Antitrust & Competition Law Class Action Lawsuits Complex Litigation

## Education

J.D., University of Tennessee, 2010 B.A., University of Mary Washington, cum laude

## Bar Admissions

States Courts of Tennessee Tennessee Supreme Court United States District Court for the District of Colorado United States District Court for the Easter District of Tennessee



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I hereby certify that I caused the foregoing to be served electronically using the Court's CM/

ECF filing system on June 30, 2023, to counsel for Defendant as follows:

H. Harold Stephens Scott Burnett Smith Whitney P. Lott Bradley Arant Boult Cummings LLP 200 Clinton Avenue West, Suite 900 Huntsville, Alabama 35801 Tel: (256) 517-5100 hstephens@bradley.com ssmith@bradley.com

Stuart M. Richter Katten Muchin Rosenman LLP 2029 Century Park East, Suite 2600 Los Angeles, California 90067 Tel: (310) 788-4400 Stuart.richter@katten.com

> <u>/s/ Sophia Goren Gold</u> Sophia Goren Gold