

J. Dominick Larry (*pro hac vice*)
nl@kellerpostman.com
KELLER POSTMAN LLC
150 N. Riverside Plaza, Suite 4100
Chicago, IL 60606
Phone: (312) 948-8472

Settlement Class Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

*In re LinkedIn Advertising Metrics
Litigation*

) Case No.: 5:20-cv-08324-SVK

) **DECLARATION OF J. DOMINICK
LARRY IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF J. DOMINICK LARRY

Pursuant to 28 U.S.C. § 1746, I, J. Dominick Larry, hereby declare and state as follows:

1. I am an attorney admitted to practice in the State of Illinois, and before this Court *pro hac vice*. I am Senior Counsel at Keller Postman LLC, which has been retained to represent Plaintiffs TopDevz, LLC and Noirefy, Inc. and appointed as Settlement Class Counsel in this matter. I am over the age of 18 and am fully competent to make this declaration. This declaration is based upon my personal knowledge, except where expressly noted otherwise. If called to testify regarding the matters asserted herein, I could and would do so.

Settlement Administration

2. Since preliminary approval, Keller Postman has continued to work on the Class's behalf, working with the Settlement Administrator to ensure timely dissemination of notice, reviewing the Settlement Administrator's weekly notice reports, and following up for confirmatory information regarding the same.

3. Keller Postman has not been contacted by any government official regarding the Settlement.

Time and Expenses

4. To date, Keller Postman has not been compensated for its efforts in this litigation, though it has devoted approximately 2,545 hours prosecuting the case through November 15, 2024, entailing a lodestar of approximately \$1,828,522.00 based on the firm's typical hourly rates. The team members who billed time to this case, along with their roles, hourly rates, and hours billed, are shown in the following chart:

Team Member	Role	Hourly Rate	Hours Billed	Lodestar
Warren Postman	Managing Partner	\$945.00	11.60	\$10,962.00
Marquel Reddish Longtin	Partner and Chief Client Officer	\$945.00	5.90	\$5,575.50

1	Jason Zweig	Partner	\$945.00	0.30	\$283.50
2	Nick Larry	Senior Counsel	\$945.00	696.60	\$658,287.00
3	Brooke Smith	Associate	\$650.00	505.70	\$328,705.00
4	Jennifer Hanna	Associate	\$650.00	1.40	\$910.00
5	Patrick Huber	Associate	\$650.00	370.90	\$241,085.00
6	Jason Ethridge	Associate	\$650.00	465.60	\$302,640.00
7	Grant Watson	Senior Staff Attorney and E- Discovery Specialist	\$945.00	245.20	\$231,714.00
8					
9					
10	Andy Ho	Paralegal	\$200.00	53.60	\$10,720.00
11	Marvin Washington	Paralegal	\$200.00	0.80	\$160.00
12					
13	Melissa Spalding	Paralegal	\$200.00	162.50	\$32,500.00
14					
15	Nicole Nowacki	Paralegal	\$200.00	0.40	\$80.00
16	DuVon Floyd	Paralegal	\$200.00	24.50	\$4,900
17	Total			2,545.00	\$1,828,522.00

18 5. The hourly rates set forth above are based on the attorneys' experience, periodical
19 review of the rates charged by other attorneys involved in similarly complex litigation, and the
20 rates charged by counsel's hourly clients. Based on my experience with similar settlements in past
21 cases, I anticipate that Keller Postman will continue to incur expenses and that its lodestar will
22 continue to increase through and following final approval of the settlement.

23 6. Based on my experience litigating class actions and complex cases, and based on
24 my familiarity with the strengths and weaknesses of Plaintiffs' case, I believe the Settlement to
25 be fair, reasonable, adequate, and worthy of approval. Among other things, the Settlement offers
26 strong relief, especially compared to the similar class actions that have resulted in non-recoveries.

1 ***Exhibits***

2 7. A true and accurate copy of the parties' class action settlement agreement is
3 attached hereto as Exhibit A.

4 8. A true and accurate copy of the addendum to the parties class action settlement
5 agreement is attached hereto as Exhibit B.

6 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
7 19th day of November, 2024 in Chicago, Illinois.

8 By: s/ J. Dominick Larry
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28