

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

GEORGE NELSON, on behalf of himself)	
and all others similarly situated,)	
)	Civil Action No.: 1:18-cv-07400
Plaintiff,)	Honorable Sara L. Ellis
)	
v.)	
)	
)	
ROADRUNNER TRANSPORTATION)	
SYSTEMS, INC.,)	
)	
Defendant.)	

**DECLARATION OF SHANNON M. McNULTY IN SUPPORT OF
REPRESENTATIVE PLAINTIFFS’ MOTION AND
SUPPORTING MEMORANDUM OF LAW FOR APPROVAL OF
ATTORNEYS’ FEES, COSTS AND EXPENSES, AND SERVICE AWARDS**

I, Shannon M. McNulty , pursuant to 28 U.S.C. § 1746, declare as follows:

1. I have been licensed to practice law in the state of Illinois since .
2. I was one the lawyers in charge involved in repressing Plaintiff and the class in this litigation and I worked collaboratively with my co-counsel at Morgan & Morgan to ensure that Plaintiff and the class which he sought to represent was zealously represented, while also ensuring efficiency and reducing duplicative effort.
3. The hourly rates of the professionals in my firm, including my own, reflect experience and accomplishments in the area of class litigation generally, and data breach and privacy litigation specifically. The rate of \$650.00 per hour which I charge for my time is commensurate with hourly rates charged by my contemporaries around the country, including those rates charged by lawyers with my level of experience who practice in the area of class

litigation across the nation. Courts in this District and in other federal courts have awarded this rate to me for my work in class and complex litigation..

4. The lawyers and other professional staff of my firm maintain and record their respective time and the specific services they perform contemporaneously in a computerized system. Based upon the records in this system, my firm’s lodestar is in excess of 22.95 hours as of July 17, 2020, amounts to \$14,917.50 in lodestar. Additional time will be spent to prepare for and attend the fairness hearing and obtain final approval, defend any appeals taken from the final judgment approving settlement, and ensure that the distribution of settlement proceeds to class members is done in a timely manner in accordance with the terms of the settlement. I assert that the attorneys’ fees sought in the motion for attorneys’ fee is reasonable and seeks fair and reasonable compensation for undertaking this case on a contingency basis where there was a risk that without a successful outcome, we would not receive anything for our labor ,and for obtaining the relief for Plaintiffs and the class. Throughout this action, we have been challenged by highly experienced and skilled counsel , who focuses on privacy litigation , and who deployed very substantial resources on Defendant’s behalf.

5. The chart below reflects the amount of time spent by me in the prosecution of this case:

Name	Title	Hourly Rate	Time Spent	Total Billed
	Partner	\$650.00	22.95	\$14, 917.50
Total			22.95	\$14, 917.50

6. A breakdown of my firm’s costs and expenses, again pulled from a computerized database, are reflected below. It is my opinion that these costs were necessarily expended in the representation fo plaintiff and the class to advance the claims contained in the litigation and to

obtain the settlement achieved in this case.

Postage & Shipping	\$20.74
Filing Fees	\$400.00
Deposition transcript	\$21.75
TOTAL	442.49

7. Additional costs and expenses will be incurred before our work is done in this case, as is true of the additional services which we will provide to the class.

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

Executed this 17th of July, 2020 at Chicago , Illinois.

By: /s Shannon M. McNulty
Shannon M. McNulty , Esq.