

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JULIET MURPHY, et al.,

Plaintiffs,

v.

TOYOTA MOTOR CORPORATION, et al.

Defendants.

Consolidated Case No.: 4:21-cv-00178-ALM

**DECLARATION OF DAVID C. WRIGHT IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF
McCUNE LAW GROUP, APC**

I, David C. Wright, declare as follows:

1. I am a partner at the law firm of McCune Law Group, APC, (hereinafter "Firm"). I make this declaration in support of Plaintiffs' Motion for Attorneys' Fees and Reimbursement of Expenses. I have personal knowledge of the information stated within this declaration and, if necessary, I could and would competently testify to this information.

2. Throughout the duration of the litigation of this matter, my Firm actively participated in the pursuit of the Plaintiffs' claims at the request of Interim Lead Class Counsel Kimberly A. Justice of Freed Kanner London & Millen LLC.

3. Attached as Exhibit A is a billing summary of my Firm's total hours and lodestar at current billing rates, from matter inception through September 15, 2024. The total number of hours worked by my Firm's attorneys during that period was 1,301.9 hours with a corresponding lodestar of \$1,090,325.00.

4. Exhibit A was prepared using accurate, daily time records that are maintained by my Firm. The current hourly rates provided for my Firm's attorneys are the same as our usual and customary hourly rates charged in similar complex class action litigation.

5. The tasks undertaken by my Firm include as follows: (a) a factual investigation and analysis in connection with drafting the consolidated complaint; (b) participation in conferences with co-counsel to discuss case management and litigation strategy; (c) drafting and editing pleadings for class certification, including conducting research of applicable law in connection with the motion for class certification; (d) drafting discovery requests; (e) reviewing documents produced by Defendants and/or third-parties; (f) responding to Defendants' discovery requests, including working with Plaintiffs to search for documents, and attending meet and confer conferences with Defendants, (g) reviewing Plaintiffs' documents for production to Defendants; (h); working with experts for purposes of determining damages and liability for purposes of class certification and settlement; (i) preparing for depositions of Defendants executives; (j) prepare class representatives for deposition; (k) negotiating and drafting the settlement agreement and approval papers; (l) other (being the principal negotiator for Plaintiffs under the direction of Lead counsel).

6. Attached as Exhibit B is a summary of the expenses my Firm has incurred from matter inception to September 15, 2024 by category. My Firm's total expenses is \$56,356.56. These expenses have yet to be reimbursed.

7. The expenses in this declaration are reflected in my Firm's accounting records. Exhibit B was assembled and prepared by my staff and reviewed by me. The expenses were prepared from receipts, check records, and other source materials. These are accurate records of the expenses. The expenses reflect the costs and charges incurred for work performed throughout this litigation. If requested, I could provide receipts or other supporting records for each expense included on Exhibit B. The amount of my Firm's expenses is reasonable, and was necessary for

the efficient and effective prosecution of this matter. I believe that the expenses submitted are of a type normally charged to and paid by fee-paying clients.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 13th day of September, 2024, in Rancho Cucamonga, California.



David C. Wright

EXHIBIT A

Name	Title	Current Billing Rate	Hours Billed	Lodestar
David Wright	Partner	\$950	908.4	\$862,980.00
Steven Haskins	Partner	\$800	10.4	\$8,320.00
Dana Vogel	Partner	\$750	20.7	\$15,525.00
Mark Richards	Associate	\$650	232.4	\$151,060.00
Keena Patel	Associate	\$650	7.0	\$4,550.00
James Perry	Associate	\$650	1.5	\$975.00
Andy Van Ligten	Associate	\$450	46.2	\$20,790.00
Chris Sloom	Associate	\$550	3.7	\$2,035.00
Addison Alvarado	Associate	\$450	15.6	\$7,020.00
Jordan Wispell	Associate	\$480	1.5	\$720.00
Ann Smith	Paralegal	\$300	8.2	\$2,460.00
Cynthia Marin	Paralegal	\$300	46.3	\$13,890.00
TOTAL			1,301.9	\$1,090,325.00

EXHIBIT B

EXPENSE	AMOUNT
Copying	\$400.00
Outside Printing	\$435.84
Telephone	\$11.25
Postage	\$39.30
Out-of-town Travel	\$3,391.55
Litigation Fund Assessments	\$46,000.00
Other	\$24,078.62
TOTAL	\$56,356.56