

EXHIBIT D

**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 ERIC B. SNYDER IN SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF
BAILEY & GLASSER LLP**

I, Eric B. Snyder, declare as follows:

1. I am a partner at the law firm of Bailey & Glasser LLP (sometimes, the "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, the 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. My former law partner, Todd A. Walburg, served on the Executive Committee while he was a partner at Bailey & Glasser LLP, from the time of Mr. Walburg's appointment until July 1, 2024. Thereafter, Mr. Walburg continued in his role on the Executive Committee at a new firm, McCune Law Group, from August 1, 2024 to the present.

4. Attached as Exhibit A is a billing summary of the Firm's total hours and lodestar at current billing rates, from matter inception through September 15, 2024. The total number of

hours worked by the Firm's attorneys and paralegals during that period is 1,216.4 hours with a corresponding lodestar of \$852,465.00.

5. Included with Exhibit A are accurate, daily time records that are maintained by the Firm. I am familiar with the billing rates for attorneys and paralegals with experience similar to those attorneys and paralegals who worked on this matter. The hourly rates provided in Exhibit A for the Firm's attorneys and paralegals are reasonable and consistent with the rate of attorneys and paralegals with similar experience and qualification and with our usual and customary hourly rates charged in similar complex class action litigation, both contingent and hourly.

6. The tasks undertaken by the 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; and other miscellaneous work necessary for the role of an Executive Committee member and one of the primary firms litigating this matter.

7. Attached as Exhibit B is a summary of the expenses the Firm has incurred from matter inception to September 15, 2024 by category. The Firm's total expenses are \$67,704.24. These expenses have yet to be reimbursed.

8. The expenses in this declaration are reflected in the 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 the 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 that the foregoing is true and correct. Executed this 9th day of September 2024 in Charleston, West Virginia.



Eric B. Snyder

EXHIBIT A

Name	Title	Current Billing Rate	Hours Billed	Lodestar
Todd A. Walburg	Partner	\$900.00	407.7	\$366,930.00
Katherine E. Charonko	Partner	\$800.00	31.2	\$24,960.00
Benjamin L. Bailey	Partner	\$1,000.00	1.8	\$1,800.00
Brian J. McAllister	Partner	\$800.00	0.7	\$560.00
Eric B. Snyder	Partner	\$900.00	0.3	\$270.00
Tony L. Clackler	Associate	\$700.00	319.9	\$223,930.00
Scott B. Baez	Associate	\$600.00	275.3	\$165,180.00
Christopher D. Smith	Associate	\$650.00	1.9	\$1,235.00
Elizabeth L. Stryker	Associate	\$500.00	0.6	\$300.00
Jon D. Boggs	Of Counsel	\$900.00	0.4	\$360.00
Whitney A. Johnson	Paralegal	\$400.00	139.6	\$55,840.00
Josephine T. Zumot	Paralegal	\$300.00	37	\$11,100.00
TOTAL			1216.4	\$852,465.00

EXHIBIT B

EXPENSE	AMOUNT
Copying	
Outside Printing	
Telephone	
Online Research	\$256.16
Delivery services/messengers	\$76.51
Postage	\$6.39
Local Travel	
Out-of-town Travel	\$3,339.39
Meals	
Court/filing Fees	\$808.30
Deposition transcripts	
Litigation support vendors	
Experts	\$17,217.49
Private investigators	
Arbitrators/mediators	
Other professionals	
Other (Litigation Fund Assessments)	\$46,000.00
TOTAL	\$67,704.24