

EXHIBIT E

**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 BRUCE W. STECKLER IN SUPPORT OF PLAINTIFFS’
MOTION FOR ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON
BEHALF OF STECKLER WAYNE & LOVE PLLC**

I, Bruce W. Steckler, declare as follows:

1. I am a partner at the law firm of Steckler Wayne & Love PLLC (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 1,169.5 hours with a corresponding lodestar of \$715,865.00

4. Included with Exhibit A are 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. These rates have also

been approved in other similar class action litigations, including *Doyle v. Reata Pharmaceuticals, Inc., et al.*, Case No. 4:21-cv-00987-ALM (E.D. Texas).

5. The tasks undertaken by my Firm include as follows: (a) assisted in the preparation of filings; (b) reviewed draft filings for compliance with local and Court rules and protocol; (c) ensured compliance with local and Court rules and protocol in all other respects, (d) conducted a factual investigation and analysis in connection with drafting the consolidated complaint; (e) participated in conferences with co-counsel to discuss case management and litigation strategy; (f) drafting and editing pleadings for class certification, including conducting research of applicable law in connection with the motion for class certification; (g) reviewing documents produced by Defendants and/or third-parties; (h) attending meet and confer conferences with Defendants, (i) prepared for and attended mediation; (j); work and preparation on determining damages and liability for purposes of class certification and settlement; (k) preparing for depositions of Defendants executives; and (l) prepared for and assisted with inspections of affected vehicles. In addition, Steckler reviewed all filings to ensure compliance with the Local Rules and applicable federal procedural and substantive laws.

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 are \$22,661.59. 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 that the foregoing is true and correct. Executed this 12th day of September 2024 in Dallas County, Texas

/s/ Bruce W. Steckler
Bruce W. Steckler

EXHIBIT A

Name	Title	Current Billing Rate	Hours Billed	Lodestar
Bruce W. Steckler	Partner	\$925.00	315.50	\$291,837.50
Paul D. Stickney	Of Counsel	\$1,000.00	158.90	\$158,900.00
Austin P. Smith	Partner	\$615.00	326.50	\$200,797.50
Jamie Baciak	Paralegal	\$175.00	365.10	\$63,892.50
Robyn Shiplet	Paralegal	\$125.00	3.50	\$437.50
TOTAL			1,169.50	\$715,865.00

EXHIBIT B

EXPENSE	AMOUNT
Copying	\$891.00
Outside Printing	N/A
Telephone	N/A
Online Research	\$12.35
Delivery services/messengers	\$1,194.00
Postage	\$32.97
Local Travel	N/A
Out-of-town Travel	\$1,629.27
Meals	N/A
Court/filing Fees	\$402.00
Deposition transcripts	N/A
Litigation support vendors	N/A
Experts	N/A
Private investigators	N/A
Arbitrators/mediators	N/A
Other professionals	\$2,500.00
Other	\$16,000.00
TOTAL	\$22,661.59