

# EXHIBIT F

**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 PETER A. MUHIC IN SUPPORT OF PLAINTIFFS' MOTION  
FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF  
MUHIC LAW LLC, MILLER LAW FIRM, P.C., LEVAN MUHIC STAPLETON LLC**

I, Peter A. Muhic, declare as follows:

1. I am a partner at the law firm of Muhic Law LLC, and a former partner or shareholder of Miller Law Firm, P.C. and LeVan Muhic Stapleton LLC (hereinafter "Firms"). 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 Firms 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 Firms' total hours and lodestar at current billing rates, from matter inception through September 15, 2024. The total number of hours worked by my Firms during that period was 1000.40 hours with a corresponding lodestar of \$693,090.

4. Exhibit A was prepared using accurate, daily time records that are maintained by my Firms. 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 Firms 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) working with experts for purposes of determining damages and liability for purposes of class certification and settlement; (h) preparing for depositions of Defendants' executives; (i) drafting settlement approval papers; (j) attending multiple vehicle inspections with Plaintiffs' experts; (k) deposing Defendants' witnesses.

6. Attached as Exhibit B is a summary of the expenses my Firms have incurred from matter inception to September 15, 2024 by category. My Firms' total expenses are \$2,301.88. These expenses have yet to be reimbursed.

7. The expenses in this declaration are reflected in my Firms' 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 Firms' 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 15<sup>TH</sup> day of September, 2024.



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PETER A. MUHIC

**EXHIBIT A**

<b>Muhic Law LLC</b>	Title	Current Billing Rate	Hours Billed	Lodestar
Peter A. Muhic	Partner	\$925	110.9	\$102,582.50
<b>Total</b>			110.9	\$102,582.50
<b>Miller Law Firm, P.C.</b>	Title	Current Billing Rate	Hours Billed	Lodestar
Peter A. Muhic	Partner	\$925	433.10	\$400,617.50
Lawrence E McNair	Counsel	\$385	212.60	\$81,851.00
Mark D. Talenti	Counsel	\$385	153.60	\$59,136.00
Steven M. Zehnder	Counsel	\$465	49.00	\$22,785.00
Nancy Decker	Counsel	\$445	20.90	\$9,300.50
Rick A. Decker	Attorney	\$575	5.60	\$3,220.00
<b>Total</b>			874.80	\$576,910.00
<b>LeVan Muhic Stapleton LLC</b>	Title	Current Billing Rate	Hours Billed	Lodestar
Peter A. Muhic	Partner	\$925	14.7	\$13,597.50
<b>Total</b>			14.7	\$13,597.50
<b>TOTAL FIRMS</b>			<b>1000.4</b>	<b>\$693,090.00</b>

**EXHIBIT B**

<b>EXPENSE</b>	<b>AMOUNT</b>
Copying	\$71.63
Outside Printing	
Telephone	
Online Research	\$33.82
Delivery services/messengers	
Postage	
Local Travel (vehicle inspection – NJ)	\$101.07
Out-of-town Travel	\$1773.35
Meals	\$222.01
Court/filing Fees	\$100.00
Deposition transcripts	
Litigation support vendors	
Experts	
Private investigators	
Arbitrators/mediators	
Other professionals	
Other	
<b>TOTAL</b>	<b>\$2301.88</b>