

EXHIBIT G

**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 KATRINA CARROLL IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF
LYNCH CARPENTER LLP**

I, Katrina Carroll, declare as follows:

1. I am a partner at the law firm of Lynch Carpenter LLP (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 535.9 hours with a corresponding lodestar of \$342,480.00.

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.

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 (g) reviewing Plaintiffs' documents for production to Defendants; (h) negotiating and drafting the settlement agreement and approval papers.

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 \$33,100.00. 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 16th day of September 2024 in Chicago, Illinois.



Katrina Carroll

EXHIBIT A

Name	Title	Current Billing Rate	Hours Billed	Lodestar
Christopher Cornelius	Associate	\$500.00	144.7	\$72,350.00
Edwin J. Kilpela	Partner	\$875.00	75.9	\$66,412.50
Elizabeth Pollock-Avery	Partner	\$700.00	.4	\$280.00
Hannah Barnett	Associate	\$500.00	18.1	\$9,050.00
James LaMarca	Associate	\$500.00	149.2	\$74,600.00
Jon Romanishin	Paralegal	\$275.00	2.7	\$742.50
Katrina Carroll	Partner	\$1,050.00	78.7	\$82,635.00
Matthew Brady	Associate	\$550.00	66.2	\$36,410.00
TOTAL			535.9	\$342,480.00

EXHIBIT B

EXPENSE	AMOUNT
Copying	
Outside Printing	
Telephone	
Online Research	
Delivery services/messengers	
Postage	
Local Travel	
Out-of-town Travel	
Meals	
Court/filing Fees	\$100.00
Deposition transcripts	
Litigation support vendors	
Experts	
Private investigators	
Arbitrators/mediators	
Other professionals	
Litigation Fund Contributions	\$33,000
TOTAL	\$33,100.00