

# EXHIBIT I

**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 RUSSELL D. PAUL IN SUPPORT OF PLAINTIFFS' MOTION  
FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF  
BERGER MONTAGUE PC**

I, Russell D. Paul, declare as follows:

1. I am a partner at the law firm of Berger Montague PC (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 April 30, 2024. The total number of hours worked by my Firm's attorneys during that period was 176.1 hours with a corresponding lodestar of \$151,749.00.

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) liaising with and vetting potential class members for inclusion as Class Representatives; (b) a factual investigation and analysis in connection with drafting the consolidated complaint; (c) participation in conferences with co-counsel to discuss case management and litigation strategy; (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) working with experts for purposes of determining damages and liability for purposes of vehicle inspections and class certification; and (i) strategizing with co-counsel regarding class representatives' depositions.

6. Attached as Exhibit B is a summary of the expenses my Firm has incurred from matter inception to April 30, 2024 by category. My Firm's total expenses is \$3,204.14. 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 4<sup>th</sup> day of September 2024 in Philadelphia, PA.

/s/ Russell D. Paul

Russell D. Paul

**EXHIBIT A**

| Name             | Title          | Current Billing Rate | Hours Billed | Lodestar            |
|------------------|----------------|----------------------|--------------|---------------------|
| Paul, Russell    | Shareholder    | \$1,050              | 32.80        | \$34,440.00         |
| Muhic, Peter     | Shareholder    | \$885                | 83.50        | \$73,897.50         |
| Gertner, Abigail | Senior Counsel | \$760                | 17.30        | \$13,148.00         |
| Park, Amey       | Associate      | \$725                | 24.20        | \$17,545.00         |
| Lesser, Natalie  | Senior Counsel | \$695                | 18.30        | \$12,718.50         |
| <b>TOTAL</b>     |                |                      |              | <b>\$151,790.00</b> |

**EXHIBIT B**

| <b>EXPENSE</b>               | <b>AMOUNT</b>     |
|------------------------------|-------------------|
| Copying                      | \$3.50            |
| Online Research              | \$115.84          |
| Delivery services/messengers | \$103.62          |
| Out-of-town Travel           | \$2,065.06        |
| Meals                        | \$154.12          |
| Court/filing Fees            | \$762.00          |
| <b>TOTAL</b>                 | <b>\$3,204.14</b> |