

EXHIBIT J

**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 TAREK ZOHDY IN SUPPORT OF PLAINTIFFS' MOTION FOR
AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON
BEHALF OF CAPSTONE LAW APC**

I, Tarek Zohdy, declare as follows:

1. I am a Senior Counsel at the law firm of Capstone Law APC (hereinafter "Firm"). I make this declaration in support of Plaintiffs' Motion for an Award of 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 June 7, 2023. The total number of hours worked by my Firm's attorneys during that period was 126.1 hours with a corresponding lodestar of \$72,585.

4. The attorney hours summarized in Exhibit A are based on accurate, daily time records that are maintained by my Firm. The current hourly rates provided for my Firm's attorneys

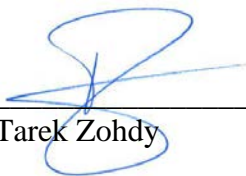
are the same as our usual and customary hourly rates charged in similar complex class action litigation.

5. The tasks undertaken by my Firm include as follows: (a) a factual investigation and analysis in connection with drafting the initial and consolidated complaint; (b) participation in conferences with co-counsel to discuss case management and litigation strategy; (c) reviewing Plaintiffs' documents for production to Defendants; and (d) communications with class members and class representatives to collect their documents and summarize their experiences.

6. Attached as Exhibit B is a summary of the expenses my Firm has incurred from matter inception to July 31, 2023 by category. My Firm's total expenses is \$920.55. 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 3rd day of September 2024 in Los Angeles, CA.



Tarek Zohdy

EXHIBIT A

Name	Title	Current Billing Rate	Hours Billed	Lodestar
Tarek Zohdy	Senior Counsel	\$675	39.6	\$26,730.00
Jamie Greene	Partner	\$650	6.8	\$4,420.00
Cody Padgett	Senior Counsel	\$600	34.9	\$20,940.00
Theresa Carroll	Senior Counsel	\$545	3	\$1,635.00
Laura Goolsby	Associate	\$475	2	\$950.00
Julian Quattlebaum	Fmr. Associate	\$450	39.8	\$17,910.00
TOTAL			126.1	\$72,585.00

EXHIBIT B

EXPENSE	AMOUNT
Copying	\$51.50
Online Research	\$103.60
Court Fees	\$765.45
TOTAL	\$920.55