

# EXHIBIT L

**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 JOHN G. EMERSON IN SUPPORT OF PLAINTIFFS' MOTION  
FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF  
EMERSON FIRM, PLLC**

I, John G. Emerson, declare as follows:

1. I am the owner and principal lawyer at the law firm of Emerson Firm, 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 April 30, 2024. The total number of hours worked by my Firm's attorneys during that period was 15.4 hours with a corresponding lodestar of \$14,630.00.

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) acting as local counsel for Russell Paul at the Berger Montague PC law firm and Tarek H. Zohdy and Cody R. Padgett at the Capstone Law APC law firm. (b) factual investigation and analysis in connection with drafting and filing the class action complaint for plaintiffs, Paola Guevara, Lee Krukowski, Pamela Woodman, and Kris Huchteman; (c) participation in conferences with co-counsel to discuss case management and litigation strategy following the filing of the Consolidated Complaint.

6. The Firm had no held expenses and therefore is not submitting an Exhibit with a summary of expenses.

7. I declare under penalty of perjury that the foregoing is true and correct. Executed this 4<sup>th</sup> day of September 2024 in Houston, Texas.

  
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JOHN G. EMERSON

**EXHIBIT A**

Name	Title	Current Billing Rate	Hours Billed	Lodestar
John G. Emerson	Partner	\$950	15.4	\$14,630.00
<b>TOTAL</b>			<b>15.4</b>	<b>\$14,630.00</b>