

EXHIBIT M

**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 BEN BARNOW IN SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF
BARNOW AND ASSOCIATES, P.C.**

I, Ben Barnow, declare as follows:

1. I am the President of the law firm of Barnow and Associates, P.C. (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, including 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 186.5 hours with a corresponding lodestar of \$103,222.50.

4. The time records summarized in 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) investigating and analyzing the facts in connection with drafting a complaint; (b) participating 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) responding to Defendants' discovery requests, including working with Plaintiff Cardelli to search for documents; (e) reviewing Plaintiff Cardelli's documents for production to Defendants; and (f) preparing Plaintiff Cardelli for deposition.

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 are \$595.87. 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 6th day of September, 2024, in Chicago, Illinois.



Ben Barnow

EXHIBIT A

Attorney	Title	Billable Rate	Hours Billed	Lodestar
Ben Barnow	President	\$1,125	9.6	\$10,800.00
Anthony L. Parkhill	Partner	\$825	22.4	\$18,480.00
Riley W. Prince	Associate	\$525	11.1	\$5,827.50
Nicholas W. Blue	Associate	\$475	143.4	\$68,115.00
TOTALS:			186.5	\$103,222.50

EXHIBIT B

EXPENSE	AMOUNT
Copying	\$0
Outside Printing	\$0
Telephone	\$0
Online Research	\$128.87
Delivery services/messengers	\$65.00
Postage	\$0
Local Travel	\$0
Out-of-town Travel	\$0
Meals	\$0
Court/filing Fees	\$402.00
Deposition transcripts	\$0
Litigation support vendors	\$0
Experts	\$0
Private investigators	\$0
Arbitrators/mediators	\$0
Other professionals	\$0
Other	\$0
TOTAL	\$595.87