

# EXHIBIT B

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

*In re: Hyundai and Kia Engine  
Litigation*

8:17-cv-00838-JLS-JDE

Related Cases:

8:17-cv-01365-JLS-JDE

8:17-cv-02208-JLS-JDE

2:18-cv-05255-JLS-JDE

8:18-cv-00622-JLS-JDE

8:18-cv-02223-JLS-JDE

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**SECOND DECLARATION OF BONNER C. WALSH IN FURTHER  
SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR CLASS  
COUNSEL FEE AND EXPENSE AWARD AND CLASS  
REPRESENTATIVE SERVICE AWARDS**

I, Bonner C. Walsh, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a member in good standing of the bars of Idaho, Texas, Washington and Oregon, and I am admitted *pro hac vice* to this Court and am counsel for Plaintiffs and the Settlement Class. I respectfully submit this declaration in further support of Plaintiffs' Unopposed Motion for Class Counsel Fees and Expenses Award and Named Plaintiffs' Service Awards. The following is based on my personal knowledge, and if called upon to do so, I could and would competently testify to the statements set forth below.

2. Between November 6, 2020 and March 20, 2021, my firm has collectively spent approximately 179.5 hours working on this case, for a total lodestar amount of \$114,440.

<b>Timekeeper</b>	<b>Hourly Rate</b>	<b>Hours</b>	<b>Total Lodestar</b>	<b>Timekeeper</b>
Bonner Walsh (P)	\$650.00	164.6	\$106,990.00	Bonner Walsh (P)
Carla Walsh (P)	\$500.00	14.9	\$7,450.00	Carla Walsh (P)
<b>Totals</b>		<b>179.5</b>	<b>\$114,440.00</b>	<b>Totals</b>

3. . Consistent with Your Honor’s Procedures, a spreadsheet in Microsoft Excel format that lists billed tasks will be provided to the Court.

4. Between November 6, 2020 and March 20, 2021, my firm has expended addition costs of approximately \$155.98 for additional charges by BlackBook.com for subscription costs. These expenses are reflected in the books and records of my firm. All of the expenses incurred were reasonable and necessary to the prosecution of this case. These expenses are detailed below.

5. When combined with the time previously submitted to the Court through November 5, 2020, my firm has spent a total of 1020.1 hours working on this case, for a total lodestar amount of \$651,260.00. My firm has also expended \$19,911.49 in total costs.

Dated: March 24, 2021

/s/ Bonner C. Walsh  
Bonner C. Walsh

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**SECOND DECLARATION OF MATTHEW D. SCHELKOPF IN FURTHER  
SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR CLASS  
COUNSEL FEE AND EXPENSE AWARD AND CLASS  
REPRESENTATIVE SERVICE AWARDS**

I, Matthew D. Schelkopf, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a member in good standing of the bar of the Commonwealth of Pennsylvania, and I am admitted *pro hac vice* to this Court and am counsel for Plaintiffs and the Settlement Class. I respectfully submit this declaration in further support of Plaintiffs' Unopposed Motion for Class Counsel Fees and Expenses Award and Named Plaintiffs' Service Awards. The following is based on my personal knowledge, and if called upon to do so, I could and would competently testify to the statements set forth below.

2. Between November 6, 2020 and March 20, 2021, my firm has collectively spent approximately 291 hours working on this case, for a total lodestar amount of \$158,077.50.

<b>Name</b>	<b>Role</b>	<b>Rate</b>	<b>Hours</b>	<b>Lodestar</b>
Matthew D. Schelkopf	Partner	\$700	148.2	\$103,740.00
Lori Kier	Of Counsel	\$500	25.40	\$12,700.00
Joseph B. Kenney	Associate	\$475	35.50	\$16,767.50
Paula Lyons	Paralegal	\$300	82.90	\$24,870.00
<b>Totals</b>			<b>291.8</b>	<b>\$158,077.50</b>

3. Due to the amount of privileged information contained in the hourly billing records, those detailed records are not attached here. Consistent with Your Honor's Procedures, a spreadsheet in Microsoft Excel format that lists billed tasks will be provided to the Court.

4. Between September 25, 2020 and November 5, 2020, my firm has expended costs of approximately \$16,548.24. These expenses are reflected in the books and records of my firm. All of the expenses incurred were reasonable and necessary to the prosecution of this case. These expenses are comprised of \$11.05 in mailing fees, \$340.00 in expert storage fees for a failed Class Vehicle engine, and expert fees of \$16,197.19.

5. When combined with the time previously submitted to the Court on September 30, 2020, my firm has spent a total of 1,854.3 hours working on this case, for a total lodestar amount of \$1,157,815. My firm has also expended \$55,991.95 in total costs.

Dated: April 5, 2021

*/s/ Matthew D. Schelkopf*  
Matthew D. Schelkopf

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

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8:18-cv-02223-JLS-JDE

**SECOND DECLARATION OF ADAM GONNELLI IN FURTHER  
SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR CLASS  
COUNSEL FEE AND EXPENSE AWARD AND CLASS  
REPRESENTATIVE SERVICE AWARDS**

I, Adam Gonnelli, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a member in good standing of the bar of New York and am admitted *pro hac vice* in this case. I am counsel for Plaintiffs and the Settlement Class. I respectfully submit this Second Declaration in Further Support of Plaintiffs' Unopposed Motion for Class Counsel Fees and Expenses Award and Named Plaintiffs' Service Awards. The following is based on my personal knowledge, and if called upon to do so, I could and would competently testify to the statements set forth below.

2. Between November 6, 2020 and March 20, 2021, I spent 103.1 hours working on this case, for a total lodestar of \$81,946.50.

3. Consistent with Your Honor's Procedures, a spreadsheet in Microsoft Excel format that lists billed tasks will be provided to the Court.

4. Between November 6, 2020 and March 20, 2021, my firm has expended additional costs of \$10,337.75 on expert fees and expenses. These

1 expenses are reflected in the books and records of my firm. All of the expenses  
2 incurred were reasonable and necessary to the prosecution of this case.

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4 5. When combined with the time I previously submitted to the Court  
5 through November 5, 2020 (and not counting the time I spent working on the case  
6 when I was a partner with The Sultzer Law Group), I have spent a total of 273.4  
7 hours working on this case, for a total lodestar amount of \$217,353.00. My firm  
8 has also expended total costs of \$18,953.50 in this case.

9 Dated: March 23, 2021



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11 Adam Gonnelli  
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1 Matthew D. Schelkopf (*pro hac vice*)  
2 SAUDER SCHELKOPF  
3 555 Lancaster Avenue  
4 Berwyn, PA 19312  
5 Telephone: (610) 200-0581  
6 mds@sstrialawyers.com

7 Adam Gonnelli (*pro hac vice*)  
8 THE SULTZER LAW GROUP  
9 85 Civic Center Plaza, Suite 104  
10 Poughkeepsie, NY 12601  
11 Telephone: (845) 483-7100  
12 gonnellia@thesultzerlawgroup.com

13 Bonner Walsh (*pro hac vice*)  
14 WALSH PLLC  
15 1561 Long Haul Road  
16 Grangeville, ID 83530  
17 Telephone: (541) 359-2827  
18 bonner@walshpllc.com

19 *Attorneys for Plaintiffs and the Settlement Class*  
20 *[List of additional counsel on signature page]*

21 **UNITED STATES DISTRICT COURT**  
22 **CENTRAL DISTRICT OF CALIFORNIA**

23 *In re: Hyundai and Kia Engine Litigation*

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8:18-cv-00622-JLS-JDE  
8:18-cv-02223-JLS-JDE

**SECOND SUPPLEMENTAL  
DECLARATION OF STEVE W.  
BERMAN IN SUPPORT OF  
PLAINTIFFS' UNOPPOSED  
MOTION FOR CLASS COUNSEL  
FEE AND EXPENSE AWARD AND  
CLASS REPRESENTATIVE  
SERVICE AWARDS**

Hon. Josephine L. Staton  
Courtroom 10A



1 I, STEVE W. BERMAN, declare as follows:

2 1. I am an attorney admitted *pro hac vice* in this litigation, the managing  
3 partner of the law firm Hagens Berman Sobol Shapiro LLP (“Hagens Berman”), and  
4 counsel of record for Plaintiffs Danny Dickerson, Robert Fockler, Amy Franklin,  
5 Donald House, Dave Loomis, Joseph McCallister, Arron Miller, Ricky Montoya,  
6 Lynn North, Mark Rice, Reid Schmitt, James Smith, and Chris Stackhouse (the  
7 “*Flaherty* Settling Plaintiffs”) in *Flaherty et al. v. Hyundai Motor Company et al.*, No.  
8 18-cv-02223 (C.D. Cal.). I could and would competently testify to the matters stated in  
9 this Declaration based on my personal knowledge or discussions with counsel in my  
10 firm.

11 2. This Court appointed me to serve as Class Counsel alongside Matthew  
12 Schelkopf of Sauder Schelkopf, Adam Gonnelli of The Sultzer Law Group, and  
13 Bonner Walsh of Walsh PLLC in its May 7, 2020 Order conditionally approving  
14 Plaintiffs’ Motion for Preliminary Approval of Class Settlement.

15 3. I submit this second supplemental declaration in support of Plaintiffs’  
16 Unopposed Motion for Class Counsel Fee and Expense Award and Class  
17 Representative Service Awards.

18 **HAGENS BERMAN SUPPLEMENTAL LODESTAR AND EXPENSES**

19 4. From November 6, 2020, to March 20, 2021, Hagens Berman spent  
20 107.50 hours litigating this case, for a total firm lodestar of \$50,065.00. A summary of  
21 hours incurred by timekeeper, with respective rates and roles included, is below:

Timekeeper	Role	Rate	Hours	Amount
Berman, Steve	Partner	\$1125.00	2.00	\$2,250.00
Carey, Robert	Partner	\$850.00	0.50	\$425.00
Fitzpatrick, Rachel	Associate	\$500.00	78.90	\$39,450.00
DeStefano, John	Associate	\$575.00	0.40	\$230.00
Johnson, Cindy	Paralegal	\$300.00	18.00	\$5,400.00
Pearce, Susan	Paralegal	\$300.00	7.70	\$2,310.00

Timekeeper	Role	Rate	Hours	Amount
<b>TOTALS:</b>			<b>107.50</b>	<b>\$50,065.00</b>

5. Because our time records contain privileged information, we do not attach them here. Consistent with the Court’s procedures, we will provide our detailed time records in spreadsheet format to the Court for review *in camera*.

6. From October 24, 2020, to March 24, 2021, Hagens Berman incurred \$19,472.84 in costs attributable to this litigation. A summary of these costs by category is below:

Expense Category	Amount
Court Fees/Filing Fees	\$1,028.21
Overnight Shipping	\$34.26
Messenger / Process Server	\$2,395.43
Online Services / Legal Research (i.e., Westlaw, PACER, Everlaw)	\$517.94
Expert Fees	\$15,497.00
<b>TOTALS:</b>	<b>\$19,472.84</b>

7. It is Hagens Berman’s policy and practice to prepare records from expense invoices, check and credit card records, and other source materials. Based on my oversight of our firm’s work in this litigation and my review of these records, I believe they constitute an accurate record of the expenses actually incurred by our firm.

8. In my professional opinion, these additional costs are typical and reasonable.

9. Hagens Berman is incurring more time and costs currently, and expects to continue incurring time and costs through final approval, the claims deadline, and perhaps on appeal.

10. When combined with our time and costs previously submitted to the Court on September 30 and November 6, 2020, Hagens Berman has spent 2001.60

1 total hours litigating this case, for a total lodestar of \$926,018.50. My firm has also  
2 expended \$75,187.56 in total costs.

3 I declare under penalty of perjury under the laws of the United States that the  
4 foregoing is true and correct. Executed March 25, 2021, in Seattle, Washington.

5  
6 /s/ Steve W. Berman  
7 STEVE W. BERMAN

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9 Additional Counsel of Record:

10 Steve W. Berman (*pro hac vice*)  
11 **HAGENS BERMAN SOBOL SHAPIRO LLP**  
12 1301 Second Avenue, Suite 2000  
13 Seattle, WA 98101  
14 Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
steve@hbsslaw.com

15 Rachel E. Fitzpatrick (*pro hac vice*)  
16 **HAGENS BERMAN SOBOL SHAPIRO LLP**  
17 11 W. Jefferson St., Suite 1000  
18 Phoenix, AZ 85003  
Telephone: (602) 840-5900  
Facsimile: (602) 840-3012  
rachelf@hbsslaw.com

19 *Attorneys for Plaintiffs and the Settlement Class*  
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