

**Electronically Filed
by Superior Court of CA,
County of Santa Clara,
on 8/14/2023 10:27 PM
Reviewed By: R. Walker
Case #19CV357070
Envelope: 12748172**

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14 *Co-Lead Counsel for Plaintiff and the Class*

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF SANTA CLARA**

17 IN RE MAXAR TECHNOLOGIES, INC.)
18 SHAREHOLDER LITIGATION)

Case No. 19CV357070

CLASS ACTION

19 This Document Relates To:)

20 ALL ACTIONS)

**DECLARATION OF DAVID W. HALL
FILED ON BEHALF OF CO-LEAD
COUNSEL HEDIN HALL LLP IN
SUPPORT OF MOTION FOR AWARD OF
ATTORNEYS' FEES AND EXPENSES**

Date Action Filed: Oct. 21, 2019

Dept. 1

Judge: Hon. Sunil R. Kulkarni

Hearing: Dec. 7, 2023, 1:30 p.m.

1 I, David W. Hall, declare as follows:

2 1. I am a partner of the firm Hedin Hall LLP (“Hedin Hall” or the “Firm”). I submit this
3 declaration, based on my personal knowledge and my review of the books and records of my Firm,
4 in support of my Firm’s motion for an award of attorneys’ fees and expenses in connection with
5 services rendered in the above-captioned action (the “Action”).

6 2. Hedin Hall is counsel of record to Plaintiff and Class Representative Michael
7 McCurdy and court-appointed Co-Lead Counsel for the certified Class.

8 3. The information in this declaration regarding my Firm’s time and expenses is taken
9 from time and expense reports and supporting documentation prepared and/or maintained by the Firm
10 in the ordinary course of business. I am the partner who oversaw and conducted the day-to-day
11 activities in the Action and I reviewed these reports (and backup documentation where necessary or
12 appropriate) in connection with the preparation of this declaration. The purpose of this review was to
13 confirm both the accuracy of the entries as well as the necessity for, and reasonableness of, the time
14 and expenses committed to the Action. As a result of this review, reductions were made to both time
15 and expenses in the exercise of billing judgment. Based on this review and the adjustments made, I
16 believe that the time reflected in the Firm’s lodestar calculation and the expenses for which payment
17 is sought herein are reasonable and were necessary for the effective and efficient prosecution and
18 resolution of the Action.

19 4. After the reductions referred to above, the number of hours spent attorneys of my Firm
20 on the Action by the Firm is 8,201.6. A breakdown of the hours expended and hourly rate of each
21 attorney, and the total “lodestar” incurred by them, is provided in the attached Exhibit A. As reflected
22 in Exhibit A, the total value of attorney time expended by my Firm on this matter, based on the current
23 hourly rates of the Firm’s attorneys, is \$5,982,760.00. The hourly rates shown in Exhibit A are
24 consistent with the hourly rates currently charged by the Firm’s in similar securities class action
25 litigation, and are set based on periodic analyses of rates charged by firms performing comparable
26 work both on the plaintiff and defense side in the same legal markets.

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CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2023, I served the foregoing document on all counsel on record through One Legal LLC’s e-filing system.

/s/ Adam E. Polk
Adam E. Polk

EXHIBIT A

EXHIBIT A

In re Maxar Technologies, Inc. Shareholder Litig., No. 19CV357070

Hedin Hall LLP

Inception through August 10, 2023

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
David W. Hall	(P)	4,072.2	800	\$3,257,760.00
Frank S. Hedin	(P)	272.6	800	\$218,080.00
Armen Zohrabian	(C)	3,539.6	650	\$2,300,740.00
Arun Ravindran	(C)	317.2	650	\$206,180.00
<i>TOTAL</i>		<i>8,201.6</i>		<i>\$5,982,760.00</i>

(P) Partner

(C) Counsel

EXHIBIT B

In re Maxar Technologies, Inc. Securities Litigation
Case No. 19CV357070

HEDIN HALL LLP

EXPENSE REPORT — Inception - August 13, 2023

Hedin Hall Category Name	Total Expenses per Category
Air Transportation	\$ 2,795.75
Computer Research (e.g., Westlaw)	\$ 16,879.46
Copies	\$ 112.60
Court Reporters/Transcripts	\$ 1,890.89
Court/Filing Fees	\$ 1,435.00
Deposition Fees	\$ 10,267.10
Document and Database Management	\$ 19,120.00
Expert Fees	\$ 148,734.04
Foreign Counsel Fees and Expenses	\$ 19,763.69
Ground Transportation	\$ 292.50
KPMG - Out of State Discovery	\$ -
Lodging	\$ 2,023.35
Meals	\$ 622.85
Mediation/Arbitration	\$ 34,100.00
Miscellaneous	\$ 122.80
Online Advertising	\$ 1,826.52
Postage/Express Delivery/Messenger	\$ -
Telephone/Facsimile	\$ -
Witness/Process Service Fees	\$ -
Total	\$ 259,986.55

EXHIBIT C

HEDIN HALL LLP

FIRM RESUME

1. With offices in San Francisco, California and Miami, Florida, Hedin Hall LLP represents consumers and shareholders in data-privacy, financial services, and securities class actions in state and federal courts nationwide.

2. We prosecute difficult cases aimed at redressing injuries suffered by large, diverse groups of people, many of which implicate cutting-edge technologies and issues of national significance. Our work has led to meaningful, industry-wide changes for the betterment of society and, over the past nine years alone, has contributed to the recovery of over \$1 billion for the aggrieved consumers and investors we have had the privilege to represent. Representative examples of our securities work include:

- *Plymouth County Retirement System v. Impinj, Inc., et al.*, (N.Y. Sup. Ct., N.Y. Cnty.) (\$20 million aggregate settlement for class of aggrieved investors);
- *In re PPD AI Grp. Sec. Litig.*, (N.Y. Sup. Ct., N.Y. Cnty.) (\$9 million settlement for class of aggrieved investors);
- *In re Altice USA, Inc. Sec. Litig.*, (N.Y. Sup. Ct., Queens Cnty.) (\$4.75 million settlement for class of aggrieved investors);
- *Plutte v. Sea Ltd.*, (N.Y. Sup. Ct., N.Y. Cnty.) (\$10.75 million settlement for class of aggrieved investors);
- *In re EverQuote, Inc. Sec. Litig.*, (N.Y. Sup. Ct., N.Y. Cnty.) (\$4.75 million settlement for class of aggrieved investors);
- *In re Menlo Therapeutics Inc. Sec. Litig.*, (Cal. Sup. Ct., San Mateo Cnty.) (\$9.5 million settlement for class of aggrieved investors);
- *City of Sterling Heights General Employees' Retirement System v. Prudential Financial, Inc.* (D. N.J.) (\$33 million settlement for class of aggrieved investors);
- *Louisiana Municipal Police Employees' Pension Fund v. KPMG, LLP, et al.* (N.D. Ohio) (\$32.6 million settlement for class of aggrieved investors);
- *Cyan v. Beaver County Employees Retirement Fund*, (U.S. Supreme Court) (9-0 victory for plaintiffs on issues of first impression related to concurrent jurisdiction, dual sovereignty, the Supremacy Clause, PSLRA, SLUSA, and the Securities Act removal bar)
- *Wiley v. Envivio, Inc., et al.* (Cal. Sup. Ct., San Mateo Cnty.) (\$8.5 million settlement for class of aggrieved investors);

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- *In re MobileIron Shareholder Litig.* (Cal. Sup. Ct., Santa Clara Cnty.) (\$7.5 million settlement for class of aggrieved investors);
- *In re Model N Shareholder Litig.* (Cal. Sup. Ct., San Mateo Cnty.) (\$8.55 million settlement for aggrieved class of investors);
- *Xiang v. Inovalon Holdings, Inc., et al.* (S.D.N.Y.) (\$17 million settlement for aggrieved class of investors);
- *Buelow v. Alibaba Group Holding Ltd., et al.* (Cal. Sup. Ct., San Mateo Cnty.) (\$75 million settlement for aggrieved class of investors).

3. Our founding partners, Frank S. Hedin and David W. Hall, have significant experience representing nationwide groups of people in disputes concerning shareholder rights, data privacy, and consumer protection. All of the firm attorneys and support staff are committed to representing everyday people in complex class action litigation. Our shareholder rights practice, in particular, runs the gamut, from historic securities fraud class actions to pioneering recoveries in the wake of botched IPOs to the still emerging threat of crypto-currency fraud. We stay ahead of the curve by eschewing the assembly line approach of other firms. Fresh eyes and an open mind give us an edge, and it pays off for the individual and institutional investors we represent. Over the past 5 years alone, the work of our attorneys has contributed to over \$500 million in recoveries for aggrieved investors.

4. Frank S. Hedin, co-founder of the firm, manages the Miami office. He is a member in good standing of the Florida Bar and the State Bar of California and is admitted to practice in numerous federal district courts and circuit courts of appeals. Mr. Hedin received a Bachelor of Arts from University of Michigan, and a Juris Doctor, *magna cum laude*, from Syracuse University College of Law. After law school, Mr. Hedin served for fifteen months as law clerk to the Honorable William Q. Hayes, United States District Judge for the Southern District of California, one of the heaviest class action dockets in the country. Prior to establishing Hedin Hall LLP, Mr. Hedin was a partner at a notable litigation boutique in Miami, Florida, where he represented both plaintiffs and defendants in consumer and data-privacy class actions, employment-related collective actions, and patent and trademark litigation, and served as head of the firm's class action practice.

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5. David W. Hall is a founding partner of Hedin Hall LLP. He manages the firm's San Francisco office. He is a member in good standing of the State Bar of California and is admitted to practice in numerous federal courts. Before founding Hedin Hall LLP, Mr. Hall litigated cases for one of the largest plaintiffs' firm in the United States, where he developed, *inter alia*, state court Securities Act and data privacy class action practices. Earlier in his legal career, he was privileged to serve as a judicial law clerk to the Honorable Irma E. Gonzalez in the United States District Court for the Southern District of California, one of the heaviest class action dockets in the country. His responsibilities included civil and criminal trial dockets as well as panels of the United States Court of Appeals for the Ninth Circuit. Mr. Hall is a graduate of the University of California, Hastings College of the Law, cum laude, and the New England Conservatory of Music. At Hastings, he received a number of writing, examination, and Moot Court competition awards, served as a Staff Editor of the Hastings Business Law Journal, worked as a teaching assistant in the Legal Writing & Research Department, and served as extern to the Honorable Joyce L. Kennard of the California Supreme Court.

6. Armen Zohrabian's practice includes complex class action litigation including securities, antitrust and data privacy matters. Between 2012 and 2021, he worked on securities and antitrust matters in the San Francisco office of a prominent plaintiff-side class action firm where he helped achieve \$229.5 million in settlements. Before joining the plaintiff's bar, he worked as an associate in the San Francisco office of a large international law firm, where his practice focused on complex commercial litigation, and where he represented several *pro bono* clients in parole hearings and in asylum applications. He graduated with honors from Wake Forest University with a Bachelor of Arts degree in Politics and Economics. He earned his Juris Doctor degree from the University of California at Berkeley School of Law, Boalt Hall, with a Certificate in Law and Technology. During law school, Armen was a member of the *Berkeley Technology Law Journal*, worked as a law clerk for the Federal Trade Commission, and served as a judicial extern for the Honorable Oliver W. Wanger in

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the United States District Court for the Eastern District of California. He has been on the Homeless Action Center's board for over a decade. Based in Oakland and Berkeley, HAC provides no-cost, barrier-free, culturally competent legal representation that makes it possible for people who are homeless (or at risk of becoming homeless) to access social safety net programs that help restore dignity and provide sustainable income, healthcare, mental health treatment and housing.

7. Arun Ravindran is an accomplished trial lawyer, having tried more than twenty federal cases to jury verdict. He is dedicated to getting his clients the best possible results, even under the most challenging of circumstances. Before joining the firm, Mr. Ravindran litigated complex commercial cases at a prominent Florida law firm. Mr. Ravindran represented companies and individuals in a broad array of business disputes in state and federal courts around the country and also maintained a white-collar criminal defense practice which included grand jury representation and *pro bono* post-conviction litigation under the First Step Act. Prior to civil practice, Mr. Ravindran served for nearly five years as an Assistant Federal Public Defender in the Southern District of Florida. He defended individuals charged with federal criminal offenses, from large narcotics conspiracies to investment schemes, international wire frauds, and health care fraud. Mr. Ravindran also represented clients on appeals before the Eleventh Circuit Court of Appeals, arguing two such appeals as lead counsel. Earlier in his career he was honored to serve as a law clerk to the Honorable Patricia A. Seitz, of the United States District Court for the Southern District of Florida. Through this experience, Mr. Ravindran gained unique insights into the deliberative process. Prior to his clerkship, Mr. Ravindran proudly served as a Captain in the United States Marine Corps. As a Judge Advocate he represented Marines and Sailors charged in courts-martial with violations of the Uniform Code of Military Justice. Mr. Ravindran graduated with a BA from Emory University in 2002 and an MSc. from the London School of Economics in 2003, and obtained his law degree from Emory Law School in 2007. He is admitted to the Florida and New York bars, the Southern District of Florida, the Southern District of New York, and the Eleventh Circuit Court of Appeals. Mr. Ravindran is a

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member of Class X of the Miami Foundation's Miami Fellows program and serves on the Associate Board of Teach for America, Miami-Dade.

8. Our firm currently serves or has served as plaintiffs' counsel in numerous data-privacy, financial services, and securities class actions nationwide. *E.g.*, *Luczak v. Nat'l Beverage Corp.*, No. 18-cv-61631-KMM (S.D. Fla.) (court-appointed counsel for class in action alleging violations of federal securities laws); *Hoffman v. Stephenson, et al. (In re AT&T Sec. Litig.)*, Index No. 650797/2019 (N.Y. Sup. Ct., N.Y. Cnty.) (co-lead counsel for plaintiff class of investors asserting Securities Act claims arising from offering in connection with merger); *Plymouth County Retirement System v. Impinj, Inc., et al.*, Index No. 650629/2019 (N.Y. Sup. Ct., N.Y. Cnty.) (co-lead counsel for plaintiff class of investors asserting Securities Act claims arising from initial and secondary public offerings; \$20 million aggregate recovery); *In re Dentsply Sirona Inc. S'holders Litig.*, Index No. 155393/2018 (N.Y. Sup. Ct., N.Y. Cnty.) (counsel for plaintiff class of investors asserting Securities Act claims arising from offering in connection with merger); *In re PPD AI Grp. Sec. Litig.*, Index No. 654482/2018 (N.Y. Sup. Ct., N.Y. Cnty.) (counsel for plaintiff class of investors asserting Securities Act claims arising from initial public offering); *In re Alice USA, Inc. Sec. Litig.*, Index No. 711788/2018 (N.Y. Sup. Ct., Queens Cnty.) (counsel for plaintiff class of investors asserting Securities Act claims arising from initial public offering); *Plutte v. Sea Ltd.*, Index No. 655436/2018 (N.Y. Sup. Ct., N.Y. Cnty.) (counsel for plaintiff class of investors asserting Securities Act claims arising from initial public offering; \$10.75 million class recovery); *In re EverQuote, Inc. Sec. Litig.*, Index No. 650907/2019 (N.Y. Sup. Ct., N.Y. Cnty.) (counsel for plaintiff class of investors asserting Securities Act claims arising from initial public offering; \$4.75 million class recovery); *Wolther v. Maheshwari (In re Veeco Instruments, Inc. Sec. Litig.)*, Lead Case No. 18CV329690 (Cal. Sup. Ct., Santa Clara Cnty.) (counsel for plaintiff class of investors asserting Securities Act claims arising from offering in connection with merger; \$15 million class settlement pending); *Huguelet v. Maxim Inc.*, No. 19-cv-4452-ALC (S.D.N.Y.) (recovery on behalf of consumers alleging disclosure of personal reading information in violation of Michigan's Preservation

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of Personal Privacy Act (“PPPA”)); *Kokoszki v. Playboy Enterprises, Inc.*, No. 19-cv-10302-BAF (E.D. Mich.) (same); *Forton v. TEN: Publishing Media, LLC.*, No. 19-cv-11814-JEL (E.D. Mich.) (same); *Kittle v. America’s Test Kitchen LP*, No. 19-cv-11757-TGB (E.D. Mich.) (same); *Lin v. Crain Communications Inc.*, No. 19-cv-11889-VAR (E.D. Mich.) (same); *Markham v. Nat’l Geographic Partner’s LLC*, No. 19-cv-232-JTN (W.D. Mich.) (same); *Horton, et al. v. GameStop Corp., et al.*, No. 18-cv-0596-GJQ (W.D. Mich.) (same); *Owens, et al. v. Bank of America, N.A., et al.*, No. 19-cv-20614-MGC (S.D. Fla.) (\$4.95 million class-wide settlement); *Liggio v. Apple Federal Credit Union*, No. 18-cv-1059-LO (E.D. Va.) (\$2.7 million class-wide settlement).