

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE LONDON SILVER FIXING, LTD.
ANTITRUST LITIGATION

14-MD-02573-VEC
14-MC-02573-VEC

This Document Relates to:

The Honorable Valerie E. Caproni

ALL ACTIONS

DECLARATION OF MICHAEL DELL'ANGELO FOR BERGER MONTAGUE PC

I, Michael Dell'Angelo, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a Managing Shareholder with the law firm of Berger Montague PC ("Berger Montague"). I respectfully submit this declaration in support of Interim Co-Lead Class Counsel's Motion for Award of Attorneys' Fees and Reimbursement of Litigation Expenses in connection with services rendered in the above-captioned action ("Action").

2. The statements herein are true to the best of my personal knowledge, information and belief based on the books and records of Berger Montague and information received from its attorneys and staff. Berger Montague's time and expense records are prepared and maintained by the firm in the ordinary course of business.

3. This firm is counsel for John Hayes and KPFF Investment, Inc., who serve as Representative Plaintiffs in this Action.

4. Berger Montague serves as additional Plaintiffs' counsel for the putative class in this Action. I am the shareholder who oversaw my firm's involvement in the Action. Berger Montague's time and expense records (including, where necessary, backup documentation) have

been reviewed to confirm both the accuracy of the entries as well as the necessity for and reasonableness of the time and expenses expended in this litigation. As a result of this review, certain reductions were made to both time and expenses either in the exercise of billing judgment, directions from Interim Co-Lead Counsel, or my firm's practice. As a result of this review and related reductions, the time reflected in Berger Montague's lodestar calculation and the expenses for which payment is sought are reasonable in amount and were necessary to prosecute the Action and resolve the settlement before the Court.

5. During the course of this litigation, and as detailed herein, Berger Montague worked on assignments that it was specifically directed to perform by Interim Co-Lead Class Counsel Lowey Dannenberg, P.C. and Grant & Eisenhofer P.A ("Interim Co-Lead Class Counsel").

6. Set forth below in ¶ 8 is a summary reflecting the amount of time (after any applicable reductions) Berger Montague attorneys and professional staff of worked on the Action from the inception of the case in 2014 to October 31, 2020, and the corresponding lodestar value of that work. The schedule in ¶ 8 was prepared based upon daily time records maintained by attorneys and professional support staff at Berger Montague, and the lodestar calculations are based on the firm's current hourly billing rates.

7. The services Berger Montague performed on behalf of the putative class include, but are not limited to, the following:

- Analyzed trading records including for Representative Plaintiffs John Hayes and KPFF Investment, Inc.;
- Corresponded with Interim Co-Lead Class Counsel concerning major case developments and communicating these developments to our clients;

- Coordinated with Interim Co-Lead Class Counsel concerning the related *Gold* litigation;
- Stayed up to date on the litigation to field questions from clients;
- Reviewed and prepared the initial disclosures related to our clients;
- Worked with Interim Co-Lead Class Counsel on trading record and ESI document collections;
- Processed and prepared client documents for production; and
- Worked with Interim Co-Lead Class Counsel to respond to discovery correspondence from defendants relating to client productions.

A breakdown of Berger Montague's hours by month is attached as Exhibit A.

8. Berger Montague's total fee compensable time for which it seeks an award of attorneys' fees is summarized below.

Attorneys	Role¹	Rates	Hours from inception to 10/31/2020	Lodestar from inception to 10/31/2020
Michael Dell'Angelo	P	\$820.00	31.40	\$25,748.00
Gary Cantor	P	\$800.00	24.60	\$19,680.00
Zachary Caplan	A	\$510.00	49.50	\$25,245.00
Frank Mangiaracina	A	\$310.00	17.80	\$5,518.00
Elizabeth York	PL	\$345.00	24.60	\$8,487.00
TOTALS			147.90	\$84,678.00

9. The total time for which my firm is requesting an award of legal fees is 147.90 hours. The total lodestar value of these professional services is \$84,678.00.

¹ "P" refers to Partners. "OC" refers to Of Counsel. "A" refers to Associates. "LC" refers to Law Clerks. "PL" refers to Paralegals. "SA" refers to Staff Attorneys. "CA" refers to Contract Attorneys.

10. The above hourly rates for Berger Montague's attorneys and professional support staff are the firm's current hourly rates. The hourly rates for attorneys and professional support staff in my firm are the same as the regular rates charged for their services in contingent fee matters and non-contingent fee matters. Timekeepers with less than 15 hours were excluded. For personnel no longer employed by Berger Montague, the lodestar calculation is based on the billing rates for such personnel in his or her final year of employment. Time spent preparing the fee and expense application was also excluded.

11. The firm's lodestar figures do not include charges for expense items. Expense items are billed separately, and such charges are not duplicated in the firm's current billing rates. Further, expense items do not contain any general overhead costs and do not contain a surcharge over the amount paid to the corresponding vendor(s).

12. As detailed and categorized in the below schedule, Berger Montague has incurred a total of \$1,066.75 in expenses from inception through October 31, 2020 for which it seeks to be reimbursed from the Settlement Fund.

Expense Categories	Cumulative Expenses
Court Cost	\$461.00
Computer Research	\$72.10
Messenger/Delivery	\$80.82
Photocopies – In House	\$38.53
Postage	\$2.19
Telephone/Telecopier	\$0.40
Travel	\$411.71
TOTAL	\$1,066.75

13. As instructed by Interim Co-Lead Counsel, charges for in-house photocopying were capped at \$0.10 per page. Travel costs were roundtrip Amtrak travel to New York City for a meeting with co-counsel and plaintiffs with a meal expense totaling \$51.11.

14. The above schedule was prepared based upon expense records reflected in the books and records of Berger Montague. These books and records are prepared from expense vouchers, check records, receipts and other source materials.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 21, 2021 in Philadelphia, Pennsylvania.



Michael Dell'Angelo

EXHIBIT A

Hours by Month	
<i>Month</i>	<i>Hours</i>
January 2014	--
February 2014	--
March 2014	--
April 2014	--
May 2014	--
June 2014	--
July 2014	--
August 2014	--
September 2014	--
October 2014	--
November 2014	--
December 2014	4.40
January 2015	13.20
February 2015	0.20
March 2015	1.00
April 2015	0.60
May 2015	0.50
June 2015	--
July 2015	--
August 2015	0.50
September 2015	--
October 2015	--
November 2015	--
December 2015	--
January 2016	--
February 2016	8.80
March 2016	14.50
April 2016	2.60

Hours by Month	
<i>Month</i>	<i>Hours</i>
May 2016	0.40
June 2016	1.70
July 2016	0.30
August 2016	0.80
September 2016	0.50
October 2016	8.90
November 2016	0.90
December 2016	23.00
January 2017	12.90
February 2017	15.60
March 2017	--
April 2017	--
May 2017	--
June 2017	1.00
July 2017	--
August 2017	0.30
September 2017	0.20
October 2017	0.20
November 2017	--
December 2017	0.80
January 2018	--
February 2018	0.40
March 2018	0.20
April 2018	0.50
May 2018	0.80
June 2018	--
July 2018	2.10
August 2018	0.30

Hours by Month	
<i>Month</i>	<i>Hours</i>
September 2018	1.60
October 2018	6.90
November 2018	1.30
December 2018	1.30
January 2019	1.80
February 2019	0.20
March 2019	2.30
April 2019	1.60
May 2019	--
June 2019	0.10
July 2019	0.10
August 2019	0.20
September 2019	0.10
October 2019	0.10
November 2019	0.10
December 2019	0.10
January 2020	0.10
February 2020	0.30
March 2020	0.10
April 2020	0.20
May 2020	0.50
June 2020	3.30
July 2020	1.60
August 2020	4.20
September 2020	0.20
October 2020	1.50
November 2020	--
December 2020	--