

**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 MANUEL J. DOMINGUEZ

I, Manuel J. Dominguez, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a partner with the law firm of Cohen Milstein Sellers & Toll, PLLC (“Cohen Milstein”). 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 Cohen Milstein and information received from its attorneys and staff. Cohen Milstein’s time and expense records are prepared and maintained by the firm in the ordinary course of business.

3. This firm is counsel for Laurence Hughes who serves as a Representative Plaintiff in this Action.

4. Cohen Milstein serves as additional Plaintiffs’ counsel for the putative class in this Action. I am the partner who oversaw my firm’s involvement in the Action. Cohen Milstein’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 or to conform to the firm's agreement with Mr. Hughes, directions from Interim Co-Lead Counsel or my firm's practice. As a result of this review and related reductions, the time reflected in Cohen Milstein'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. In addition, these expenses are often charged by Cohen Milstein to its fee-paying clients.

5. During the course of this litigation, and as detailed herein, Cohen Milstein 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) Cohen Milstein attorneys and professional staff 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 Cohen Milstein, and the lodestar calculations are based on the firm's current hourly billing rates. One of the attorneys in the schedule in ¶ 8, Emmy Levens, worked on this case when she was an associate and later when she became a partner and that is why she appears twice in the schedule with different hourly rates.

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

- investigated the case;
- interviewed potential witnesses;
- worked with experts;

- drafted complaint and motions; reviewed documents produced by defendants; and
- worked with client to produce documents responsive to discovery requests.

A breakdown of Cohen Milstein's hours by month is attached as Exhibit A.

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

Attorneys	Role ¹	Rates	Hours from inception to 10/31/2020	Lodestar from inception to 10/31/2020
Dominguez, Manuel J.	P	\$850	104.50	\$88,825.00
Eisenkraft, Michael	P	\$775	37.50	\$29,062.50
Johnson, Brent	P	\$790	39.75	\$31,402.50
Levens, Emmy	P	\$680	9.00	\$6,120.00
Ruan, Matt	OC	\$725	32.50	\$23,562.50
Levens, Emmy	A	\$530	207.00	\$109,710.00
Gerschman, Nicholas	LC	\$260	41.50	\$10,790.00
Ferrone, Joseph, T.	CA	\$250	986.00	\$246,500.00
La Croix, Regina	CA	\$250	115.50	\$28,875.00
Ridge, Janet	CA	\$250	116.25	\$29,062.50
Tierney, Allison	CA	\$250	845.00	\$211,250.00
Paralegals and Legal Assistants				
Abetti, Jonathan	PL	\$300	40.50	\$12,150.00
Twigg, Andrew	PL	\$310	24.50	\$7,595.00
Clark, Suzanne	I	\$515	73.75	\$37,981.25
TOTALS			2,673.25	\$872,886.25

9. The total time for which my firm is requesting an award of legal fees is 2,673.25 hours. The total lodestar value of these professional services is \$872,886.25.

10. The above hourly rates for Cohen Milstein'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

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 and "I" refers to Investigator.

non-contingent fee matters. Timekeepers with less than 15 hours were excluded. For personnel no longer employed by Cohen Milstein, 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, Cohen Milstein has incurred a total of \$48,149.88 in expenses from inception through October 31, 2020 for which it seeks to be reimbursed from the Settlement Fund.

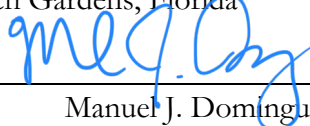
Expense Categories	Cumulative Expenses
Court Costs	\$0.00
Experts/Consultants	\$46,289.30
Federal Express	\$60.18
Hearing Transcripts	\$0.00
Investigation	\$0.00
Computer Research	\$1,409.74
Messenger/delivery	\$0.00
Photocopies – In House	\$0.00
Photocopies – Outside	\$0.00
Postage	\$0.00
Service of Process	\$0.00
Special Supplies	\$0.00
Telephone/telecopier	\$20.67
Travel	\$350.00
Miscellaneous	\$19.99
TOTAL	\$48,149.88

13. The expense total above does not include the contributions Cohen Milstein made to the litigation fund established by Interim Co-Lead Counsel to fund various litigation expenses. As instructed by Interim Co-Lead Counsel, charges for in-house photocopying were capped at \$0.10 and all air travel was limited to coach class seats. Meal expenses were capped at \$50-\$75 per day for lunch and dinner and permitted only when traveling. The expert expenses relate to our retention of an economic expert to assist us in the investigation of this matter and the drafting of the complaint. The experts analyzed the silver market and provided economic and financial evidence of the existence of the silver manipulation and its effect on the market and its participants. Various portions of their analysis are used in the current operative complaint.

14. The above schedule was prepared based upon expense records reflected in the books and records of Cohen Milstein. 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 Palm
Beach Gardens, Florida



Manuel J. Dominguez

EXHIBIT A

Hours by Month	
<u>Month</u>	<u>Hours</u>
January 2014	0
February 2014	0
March 2014	0
April 2014	0
May 2014	0
June 2014	5.75
July 2014	95.25
August 2014	98.75
September 2014	145.75
October 2014	32.50
November 2014	108.00
December 2014	4.75
January 2015	6.25
February 2015	0.25
March 2015	2.50
April 2015	0.50
May 2015	0.50
June 2015	44.50
July 2015	0
August 2015	0.25
September 2015	0
October 2015	0
November 2015	0
December 2015	0
January 2016	0
February 2016	0
March 2016	2.25
April 2016	0.25

Hours by Month	
<u>Month</u>	<u>Hours</u>
May 2016	0
June 2016	0
July 2016	19.75
August 2016	498.25
September 2016	486.25
October 2016	470.25
November 2016	373.50
December 2016	12.50
January 2017	26.50
February 2017	221.00
March 2017	0.25
April 2017	0
May 2017	2.00
June 2017	0.25
July 2017	0
August 2017	0.75
September 2017	0.25
October 2017	0
November 2017	0
December 2017	0
January 2018	0
February 2018	0.25
March 2018	0
April 2018	0
May 2018	0
June 2018	0.50
July 2018	0.25
August 2018	0.50

Hours by Month	
<u>Month</u>	<u>Hours</u>
September 2018	0
October 2018	6.00
November 2018	0.75
December 2018	0
January 2019	0.50
February 2019	0
March 2019	0
April 2019	0
May 2019	0
June 2019	0
July 2019	1.25
August 2019	0
September 2019	0
October 2019	0
November 2019	0
December 2019	0
January 2020	0
February 2020	0
March 2020	0
April 2020	0
May 2020	0
June 2020	2.50
July 2020	0.75
August 2020	0
September 2020	0
October 2020	0.50