

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

WALTER BLACK III, KEITH BARR, WAYNE  
BEST, and DAVID FANT SR., individually and  
on behalf of all others similarly situated,

*Plaintiffs,*

v.

USAA GENERAL INDEMNITY COMPANY,  
GARRISON PROPERTY AND CASUALTY  
INSURANCE COMPANY, UNITED SERVICES  
AUTOMOBILE ASSOCIATION, USAA  
CASUALTY INSURANCE COMPANY,

*Defendants.*

Case No. 8:21-CV-01581-LKG

**SUPPLEMENTAL DECLARATION OF ANDREA R. GOLD IN SUPPORT OF  
PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS AND  
SERVICE AWARDS**

I, Andrea R. Gold, declare under penalty of perjury of the laws of the United States as follows:

1. I submit this Supplemental Declaration in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs and Service Awards pursuant to the Court's Order dated April 28, 2026. ECF No. 122. This Supplemental Declaration is based on my personal knowledge and the records of my law firm. If called upon to do so under oath, I could and would testify competently to the matters set forth herein.

2. I am a Partner at the law firm of Tycko & Zavareei LLP, counsel of record for Plaintiffs, and Class Counsel in the above-captioned case.

3. Tycko & Zavareei LLP is headquartered in Washington, D.C. and maintains offices in Cleveland, OH, Los Angeles, CA, Oakland, CA, and San Diego, CA.

4. As set forth in paragraphs 45-47 of the Declaration of Andrea R. Gold in Support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Motion for Award of Attorneys' Fees and Costs and Service Awards (ECF No. 114-4, my "Original Declaration"), Tycko & Zavareei normally uses the Adjusted Laffey Matrix to provide rates for its timekeepers. Tycko & Zavareei's use of the Adjusted Laffey Matrix rates has been approved in courts across the country. The Adjusted Laffey Matrix is available at <https://www.laffeymatrix.com/index.html>, and is intended to provide reasonable rates for law firms in the Baltimore-Washington area. I am also aware that this District's Local Rules recognize the Fitzpatrick Matrix as a guideline for reasonable hourly rates for attorneys based in Washington, D.C.

5. Attached as **Exhibit 1** to this Supplemental Declaration is an expanded version of the chart included in paragraph 48 of my Original Declaration that includes the hourly rates for each timekeeper at TZ using the Adjusted Laffey Matrix (our "Ordinary Rate") and the Fitzpatrick Matrix Rate. This chart does not include time incurred following the submission of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Plaintiffs' Motion for Award of Attorneys' Fees and Costs and Service Awards.

6. As detailed in paragraph 50 of my Original Declaration, my firm advanced substantial costs to prosecute this case on behalf of Plaintiffs and the Class. In adding the itemized expenses, we made an arithmetic error: while the itemized amounts in each expense category were accurate, the total expense my firm incurred is \$18,484.30 rather than \$18,383.60 as stated in paragraph 50 of my Original Declaration. Below is a revised table reflecting the correct total

amount of expenses incurred by Tycko & Zavareei LLP. This revised table does not include the legal research costs incurred in preparing the Motions for Final Approval and for Award of Attorneys' Fees and Costs, and Service Awards, nor any costs associated with the Final Approval Hearing.

<b>Expense Category</b>	<b>Amount Incurred</b>
Copying/ Printing	\$11.25
Court Fees and PACER (Filing fees, pro hac vice applications)	\$100.70
Legal Research	\$2,144.04
Postage	\$44.87
Depositions	\$7,320.65
Travel	\$41.99
Expert and Consultant Fees	\$4,862.50
Mediation	\$3,958.30
Misc.	
<b>Total</b>	<b>\$18,484.30</b>

7. The arithmetic error regarding Tycko & Zavareei's total costs was also repeated in the summary table reflecting costs by category on page 23 of Plaintiffs' Motion for Attorneys' Fees and Costs. ECF No. 115-1 (the "Fee Motion"). My colleagues also identified typographical and arithmetic errors relating to the summary table of costs for the Fee Motion. *See* Supplemental Declaration of Keith T. Vernon; *see also* Supplemental Declaration of Jonathan P. Kagan.

8. A revised summary table of costs by category which corrects all errors is included below:

<b>Expense Category</b>	<b>Tycko &amp; Zavareei Costs</b>	<b>Timoney Knox Costs</b>	<b>Kagan, Stern, Marinello &amp; Beard Costs</b>	<b>Total</b>
Copying/ Printing	\$11.25			\$11.25
Court Fees and PACER (Filing fees, pro hac vice applications)	\$100.70	\$143.83	\$962.00	\$1,206.53
Legal Research	\$2,144.04		\$512.12	\$2,656.16
Postage	\$44.87	\$5.54	\$187.75	\$238.16
Depositions	\$7,320.65	\$7,320.65		\$14,641.30
Travel	\$41.99	\$487.06	\$21.95	\$551.00
Expert and Consultant Fees	\$4,862.50	\$51,131.80		\$55,994.30
Mediation	\$3,958.30	\$4,661.04		\$8,619.34
Misc.				
<b>Total</b>	<b>\$18,484.30</b>	<b>\$63,749.92</b>	<b>\$1,683.82</b>	<b>\$83,918.04</b>

9. As demonstrated in this summary table, Class Counsel is waiving their claim to miscellaneous costs of \$243.89 previously claimed to comply with the Settlement Agreement's requirement that the combined sum of any attorneys' fees, costs, and service awards not exceed \$2,000,000. Plaintiffs now seek **\$83,918.04** in cost reimbursement, as detailed in the chart above. This is a lesser amount than previously sought.

10. I apologize to the Court for these arithmetic and typographical errors and appreciate the Court's generosity in providing Plaintiffs with the opportunity to supplement the information provided.

#### **SUMMARY OF REQUESTS FOR ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS**

11. In the Settlement Agreement, the Parties agreed that Plaintiffs would be entitled to seek an award of attorneys' fees, costs, and service awards for each Class Representative so long

as the combined total of these amounts does not exceed \$2,000,000.000. On April 29, 2026, the Court awarded a total of \$18,000 in Service Awards to the named Plaintiffs. *See* ECF 123. Thus, per the Settlement Agreement, the remaining capped amount for attorneys' fees and costs is \$1,982,000.

12. In connection with the Order (ECF. 122), all Plaintiffs' Counsel re-reviewed their lodestar calculations. As detailed in the Supplemental Declarations of Keith T. Vernon and Jonathan M. Kagan, counsel discovered minor arithmetic and transcription errors in calculating the Fitzpatrick Matrix lodestars for Timoney Knox and Kagan, Stern, Marinello & Beard. Again, I apologize for these errors.

13. Taking into account these errors, Class Counsel and Plaintiffs' Counsel's total lodestar fee calculation using Fitzpatrick Matrix rates has only slightly decreased from \$3,623,350.90 to \$3,620,698.10, and thus the corresponding Fitzpatrick Matrix lodestar multiplier has slightly increased from 0.52381 to 0.52420.

14. While Class Counsel and Plaintiffs' Counsel's attorneys' fee request continues to be made to a percentage-of-the-fund basis, I offer this revised Fitzpatrick Matrix lodestar fee calculation and revised, yet still negative, Fitzpatrick Matrix negative lodestar multiplier in the event that this Court elects to conduct a lodestar cross-check.

15. In sum, Plaintiffs' updated, current requested fee and cost awards are as follows:

**Attorneys' Fees (unchanged):** \$1,897,980.94

**Costs (revised):** \$83,918.04

**Total of Attorneys' Fees and Costs:** \$1,981,898.98

The foregoing is true and correct to the best of my knowledge and belief. Executed on April 30, 2026 in Kensington, Maryland.

Respectfully submitted,

*/s/Andrea R. Gold*

Andrea R. Gold

# EXHIBIT 1

<b>Timekeeper</b>	<b>Professional status/ Law School Grad Yr.</b>	<b>Hours</b>	<b>Ordinary Rate</b>	<b>Ordinary Lodestar</b>	<b>Fitzpatrick Matrix Rate</b>	<b>Fitzpatrick Matrix Lodestar</b>
Andrea Gold	Partner/ 2004	402.9	\$1,227.00	\$494,538.30	\$868.00	\$349,717.20
Gemma Seidita	Associate/ 2018	442.80	\$625.00	\$276,750.00	\$691.00	\$305,974.80
Mallory Morales	Associate/ 2018	103.60	\$381.00	\$39,471.60	\$474.00	\$49,106.40
Em Cooper	Associate/ 2023	8.00	\$508.00	\$4,064.00	\$581.00	\$4,648.00
Robin Bleiweis	Associate/ 2024	2.90	\$508.00	\$1,473.20	\$581.00	\$1,684.90
Lavanya Prabhakar	Associate/ 2024	23.50	\$508.00	\$11,938.00	\$581.00	\$13,653.50
Troy Brown	Associate/ 2025	17.50	\$508.00	\$8,890.00	\$561.00	\$9,817.50
Allegra Lubar	Paralegal	49.10	\$277.00	\$13,600.70	\$255.00	\$12,520.50
Stephanie Ricker	Paralegal	10.30	\$225.00	\$2,317.50	\$220.00	\$2,266.00
James Morrison	Paralegal	9.10	\$225.00	\$2,047.50	\$220.00	\$2,002.00
Alicia Linthicum-Amos	Paralegal	4.80	\$277.00	\$1,329.60	\$255.00	\$1,224.00
Genna Wolinsky	Paralegal	7.20	\$258.00	\$1,857.60	\$236.00	\$1,699.20
Nicole Porzenheim	Paralegal	0.9	\$208.00	\$187.20	\$200.00	\$180.00
Emma Bass	Paralegal	0.8	\$258.00	\$206.40	\$255.00	\$204.00
Aaron McReynolds	Paralegal	0.4	\$208.00	\$83.20	\$207.00	\$82.80
Adam Cardona	Paralegal	0.3	\$277.00	\$83.10	\$255.00	\$76.50
<b>Tycko &amp; Zavareei total</b>		1,084.10		\$858,657.90		\$754,857.30

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Case No. 8:21-CV-01581-LKG

**SUPPLEMENTAL DECLARATION OF KEITH T. VERNON IN SUPPORT OF  
PLAINTIFFS' UNOPPOSED MOTION FOR AWARD OF ATTORNEYS' FEES AND  
COSTS AND SERVICE AWARDS**

I, Keith T. Vernon, declare under penalty of perjury of the laws of the United States as follows:

1. I am a partner in the law firm Timoney Knox, LLP (“Timoney Knox”), counsel of record for Plaintiffs, and Class Counsel in the above-captioned case. I submit this supplemental declaration pursuant to the Court’s Order dated April 28, 2026. ECF No. 122.

2. This supplemental declaration supplements my declaration in support of Plaintiffs’ Motion for an Award of Attorneys’ Fees, Expenses, and Service Awards submitted to this honorable Court on March 16, 2026. ECF No. 115-2.

3. I make this declaration based on my personal knowledge and the records of my law firm. If called upon to do so under oath, I could and would testify competently to the matters set forth herein.

4. Timoney Knox is headquartered in Fort Washington, Pennsylvania and maintains offices in Washington D.C., Bryn Mawr, Pennsylvania, and Wayne, Pennsylvania. I practice law in the District of Columbia in Timoney Knox's Washington D.C. office.

5. As described in paragraph 7 of the supplemental declaration of Andrea Gold, submitted concurrently, the expert cost correctly identified in the amount of \$51,131.80 in my declaration at paragraph 28 was erroneously identified in the summary table in the Motion for an Award of Attorneys' Fees, Expenses, and Service Awards at \$46,131.80. Despite this transcription error regarding the expert costs, the total amount of costs incurred by my firm was accurate in the summary table. The cost amounts reflected in my declaration are accurate and the correction to the costs claimed by my firm as reflected in Ms. Gold's supplemental declaration are correct.

6. The chart below includes the "Ordinary Rate" of all Timoney Knox professionals who worked on this matter. The column labeled "Ordinary Lodestar" represent Timoney Knox's professional time entries from 2020 to the filing of Plaintiffs' Motion for an Award of Attorneys' Fees, Expenses, and Service Awards, applying all time entries with each professional's 2025 Ordinary Rate. Also provided below is the "Fitzpatrick Matrix Hourly Rate" and the "Fitzpatrick Matrix Lodestar" which the Local Rules of this District recognize the Fitzpatrick Matrix as a useful guideline for hourly rates. These rates are different than our Ordinary Rates but are provided for the Court's reference. The amount of fees requested by Timoney Knox in this matter were calculated using the Ordinary Rates.

7. While Class Counsel and Plaintiffs’ Counsel are not seeking fees based on a Fitzpatrick Matrix lodestar calculation, we included this information as a cross check as detailed in the Fee Motion. The chart below further reflects two corrections identified with the Fitzpatrick Matrix Lodestar figures in my Declaration in Support of Plaintiffs’ Motion for Attorneys’ Fees and Costs and Service Awards (ECF No. 115-2). The first correction is a 60-cent difference in the Fitzpatrick Matrix Lodestar total reflecting an inadvertent exclusion of \$0.60 from one timekeeper’s lodestar. The second correction properly identifies Mr. Knox’s Fitzpatrick Matrix Lodestar with 2025 rates at \$897,884.00. While his Fitzpatrick Matrix Lodestar was properly used to complete Timoney Knox’s lodestar total, Mr. Knox’s individual Fitzpatrick Matrix Lodestar was incorrectly identified at \$803,370.60 reflecting a calculation utilizing the Fitzpatrick Matrix rate for years of work (2020, 2021, 2022, 2023, 2024, and 2025). However, in my declaration, my Firm’s total was calculated with the correct amount for Mr. Knox and remains correct, except for the 60-cent difference discussed herein.

8. My market-based rate is based on my professional experience and expertise. My rate is within a normal and customary range given the location and jurisdiction of Washington D.C. The other professionals listed in the chart below, including counsel of record for Plaintiffs and Class Counsel, Andrew Knox, practice law in Pennsylvania out of Timoney Knox’s Fort Washington, PA location. The hourly rates of each professional are normal and customary given the location and jurisdiction of the law firm office.

<b>Timekeeper</b>	<b>Professional status/ Law School Grad Yr.</b>	<b>Hours</b>	<b>Ordinary Rate</b>	<b>Ordinary Lodestar</b>	<b>Fitzpatrick Matrix Hourly Rate</b>	<b>Fitzpatrick Matrix Lodestar</b>
Keith Vernon	Partner/ 1996	1027.6	\$755	\$775,838.00	\$915	\$940,254.00
Scott	Partner/	35.8	\$625	\$22,375.00	\$931	\$33,329.80

Wolpert	1991					
Andrew Knox	Associate/ 2009	1114	\$495	\$551,430.00	\$806	\$897,884.00
Kathleen Vermilion	Associate/ 2016	521.5	\$375	\$195,562.50	\$707	\$368,700.50
Chloe Mullen-Wilson	Associate/ 2019	7.2	\$365	\$2,628.00	\$490/ \$536	\$3,716.60 <sup>1</sup>
Amie Reagan	Paralegal / NA	31.9	\$250	\$7,975	\$200	\$6,380
Legal Assistant	N/A	6.2	\$125	\$775	N/A	N/A
<b>Timoney Knox total</b>		2,744.2		\$1,556,583.50		\$2,250,264.90

9. With the correction to the cost described herein and in Ms. Gold's supplemental declaration, Plaintiffs' Counsel total claim for reimbursement of costs and fees exceeds \$2 million dollars by the amount of \$142.87. Per the Settlement Agreement, Counsels' request for fees and costs and service awards for the class representatives shall not exceed \$2 million dollars. In order to comply with this provision, Timoney Knox is waiving its claim to miscellaneous costs in the amount of \$243.89 reflected in my declaration which results in the combined request for fees, costs, and service awards to remain below \$2 million dollars and be in accord with the Settlement Agreement.

The foregoing is true and correct to the best of my knowledge and belief. Executed on April 30, 2026, in Washington, District of Columbia.

Respectfully submitted,

/s/Keith T. Vernon  
Keith T. Vernon

<sup>1</sup> The 2025 Fitzpatrick Matrix Hourly Rates were utilized to calculate the Fitzpatrick Matrix Lodestar for all professionals listed above except for Ms. Mullen-Wilson. The Fitzpatrick Matrix Lodestar for Ms. Mullen-Wilson was calculated using the applicable Fitzpatrick Matrix Rates for the years that she performed the work rather than the 2025 rate. In 2022, she performed 3.1 hours of work with a Fitzpatrick Matrix rate of \$490 per hour and totaled \$1,519.00. In 2023, she performed 4.1 hours of work with a Fitzpatrick Matrix rate of \$536 per hour and totaled \$2,197.60. The total for Ms. Mullen-Wilson for the work she performed is \$3,716.60 as reflected in the table above.

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USAA GENERAL INDEMNITY COMPANY,  
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AUTOMOBILE ASSOCIATION, USAA  
CASUALTY INSURANCE COMPANY,

*Defendants.*

Case No. 8:21-CV-01581-LKG

**SUPPLEMENTAL DECLARATION OF JONATHAN P. KAGAN IN SUPPORT OF  
PLAINTIFFS' UNOPPOSED MOTION FOR AWARD OF ATTORNEYS' FEES  
AND COSTS**

I, Jonathan P. Kagan, declare under penalty of perjury of the laws of the United States as follows:

1. I am a managing partner at the law firm Kagan Stern Marinello & Beard LLC ("Kagan Stern"). I am co-counsel of record for Plaintiffs in the above-captioned case. I submit this supplemental declaration in support of Plaintiffs' Motion for an Award of Attorneys' Fees, Costs, and Service Awards pursuant to the Court's Order dated April 28, 2026 (ECF No. 122). My original Declaration dated March 16, 2026, is incorporated herein by reference ("Original Declaration"). (ECF No. 115-3).

2. On December 16, 2025, this Court preliminary appointed Kagan Stern, along with my co-counsel Tycko & Zavareei LLP and Timoney Knox, LLP, as Class Counsel for the Settlement Class.

3. Kagan Stern is located in Annapolis, Anne Arundel County, Maryland. Kagan Stern has licensed attorneys in Washington, DC and Virginia, and our firms handles cases in these jurisdictions as well.

4. I confirmed that my Original Declaration did include the hourly rates for each of my firm's timekeepers, but in so confirming, I determined there was an arithmetic error in calculating my firm's Fitzpatrick Matrix lodestar—I originally calculated that value to be \$130,253.80, but upon re-review, it should have been \$127,600.40. Thus, I have updated **Exhibit 1** to my Original Declaration, and attached hereto, the corrected amount with the hours and rates of the timekeepers at Kagan Stern who worked on this action from 2020 to present.

5. While Class Counsel and Plaintiffs' Counsel are not seeking our fees based on a lodestar calculation, we offered it as a cross check as detailed in Plaintiffs' Motion for Award of Attorneys' Fees, Costs, and Service Awards. ECF No. 115-1 (the "Fee Motion").

6. This error in my firm's Fitzpatrick Matrix lodestar was carried over to the composite table comparing each firm's ordinary and Fitzpatrick lodestars and multipliers in the table on page 24 of the Fee Motion and had a minimal impact on the total figures: using the correct amount for my firm's Fitzpatrick lodestar, the total lodestar across all firms is \$3,620,698.10 rather than \$3,623,350.90, and the lodestar multiplier is .52420 rather than .52381.

7. I have also updated from my Original Declaration the table below for Kagan Stern to reflect the corrected amount under the Fitzpatrick Matrix lodestar.<sup>1</sup>

<b>Timekeeper</b>	<b>Professional status/ Law School Grad Yr.</b>	<b>Lodestar Hours x Hourly Rate</b>	<b>Fitzpatrick Matrix Lodestar (2025)</b>
Jonathan Kagan	Partner -1993	107.4 x \$550.00  \$59,070	107.4 \$927.00  \$99,559.80
Heather Yeung	Associate 1 – 2011	28 x \$350.00  \$9,800	28 x \$707.00  \$19,796
Meagan Borgerson	Associate 2 – 2013	8.7 x \$425.00  \$3,697.50	8.7 x \$675.00  \$5,872.50
Veronica Mina	Associate 3 – 2021	3.6 x \$350.00  \$1,260	3.6 x \$581.00  \$2,091.60
Paralegals 1	Paralegal / NA	1.1 x \$150.00  \$165.00	1.1 x \$255.00  \$280.50

**TOTALS:      \$73,992.50      \$127,600.40**

<sup>1</sup> Calculations provided herein are based on the most recent version of the Fitzpatrick matrix for 2025. Calculations for years of experience are based on the years each attorney passed the bar.

8. My firm shared some of the costs in this litigation. These expenses are reflected in the firm's books and records that are regularly maintained in the ordinary course of the firm's business, and are based on the receipts and other records maintained by the firm.

9. In reviewing my Original Declaration on expenses, I determined there was an arithmetic error in calculating my firm's expenses — I originally calculated the expenses to be \$1,641.65, but upon re-review, it should have been \$1,683.82, per the table below:<sup>2</sup>

<b>Expense Category</b>	<b>Amount Incurred</b>
Copying/ Printing	0.00
Court Fees and PACER (Filing fees, pro hac vice applications)	\$962.00
Legal Research	\$512.12
Postage / Courier	\$187.75
eDiscovery	0.00
Travel (parking)	\$21.95
Expert and Consultant Fees	0.00
Attending trial	n/a
Mediation	0.00
Misc.	0.00
<b>Total</b>	<b>\$1,683.82</b>

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<sup>2</sup> The Table of expenses in my original Declaration contained a minor mathematical error on the total and thus, has been resubmitted with this Declaration.

10. I make this declaration based on my personal knowledge and the records of my law firm. If called upon to do so under oath, I could and would testify competently to the matters set forth herein.

THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF. EXECUTED ON APRIL 30, 2026 IN ANNAPOLIS, MARYLAND.

Respectfully submitted,

/s/Jonathan Kagan  
Jonathan Kagan

Black v. USAA, et al, Case No. 8:21-cv-01581			
Kagan Stern Marinello & Beard, LLC - Breakdown by Litigation Phase			
Litigation Phase	Total Hours	Fees Per Phase (Fitzpatrick)	
1. Case development, background investigation and case administration	53.1	\$44,339.70	
2. Pleadings	10.9	\$8,812.30	
3. Interrogatories, document production, and written discovery	17.8	\$16,321.20	
4. Depositions	11.7	\$10,845.90	
5. Motions Practice	47.7	\$20,743.20	
6. Attending Court Hearings	3	\$2,781	
7. Trial preparation and post-trial motions	N/A		
8. Attending trial	N/A		
9. ADR	16.2	\$15,017.40	
10. Fee Petition Preparation	9.2	\$8,459.20	
	<b>Total</b>	<b>169.6</b>	<b>\$127,319.90</b>
		<b>w/ paralegal time</b>	<b>\$ 127,600.40</b>
	paralegal time = \$280.50		

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<b>Kagan Stern Marinello &amp; Beard, LLC - Breakdown by Litigation Phase</b>			
<u>Litigation Phase</u>		<b>Total Hours</b>	<b>Fees Per Phase (Lodestar)</b>
1. Case development, background investigation and case administration		53.1	\$25,277.50
2. Pleadings		10.9	\$4,872.50
3. Interrogatories, document production, and written discovery		17.8	\$9,692.50
4. Depositions		11.7	\$6,435.00
5. Motions Practice		47.7	\$11,970.00
6. Attending Court Hearings		3	\$1,650.00
7. Trial preparation and post-trial motions			
8. Attending trial			
9. ADR		16.2	\$8,910.00
10. Fee Petition Preparation		9.2	\$5,020.00
	<b>Total</b>	<b>169.6</b>	<b>\$73,827.50</b>
		<b>w/ paralegal time</b>	<b>\$ 73,992.50</b>
		paralegal time = \$165.00	

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Kagan Stern Marinello & Beard, LLC - Breakdown - Partner 1 (Jonathan Kagan) (Partner)						
Litigation Phase		Total Hours	Rate (Lodestar)	Fees (Lodestar)	Rate (Fitzpatrick)	Fees (Fitzpatrick)
1. Case development, background investigation and case administration		30.8	550	\$16,940	927	28551.6
2. Pleadings		5.1	550	\$2,805	927	4727.7
3. Interrogatories, document production, and written discovery		17.2	550	\$9,460	927	15944.4
4. Depositions		11.7	550	\$6,435	927	10845.9
5. Motions Practice		14.4	550	\$7,920	927	13348.8
6. Attending Court Hearings		3	550	\$1,650	927	2781
7. Trial preparation and post-trial motions		n/a				
8. Attending trial		n/a				
9. ADR		16.2	550	\$8,910	927	15017.4
10. Fee Petition Preparation		9	550	\$4,950	927	8343
<b>Total</b>		<b>107.4</b>		<b>\$59,070</b>		<b>99559.8</b>

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<b>Kagan Stern Marinello &amp; Beard, LLC - Breakdown - Associate 1 (Heather K. Yeung)</b>						
Litigation Phase	Total Hours	Rate (Lodestar)	Fees (Lodestar)	Rate (Fitzpatrick)	Fees (Fitzpatrick)	
1. Case development, background investigation and case administration	16.5	350	\$5,775	707	11665.5	
2. Pleadings	5.3	350	\$1,855	707	3747.1	
3. Interrogatories, document production, and written discovery	0	350	\$0	707	0	
4. Depositions	0	350	\$0		0	
5. Motions Practice	6.2	350	\$2,170	707	4383.4	
6. Attending Court Hearings	0	350	\$0	707	0	
7. Trial preparation and post-trial motions	n/a					
8. Attending trial	n/a					
9. ADR	0	350	\$0	707	0	
10. Fee Petition Preparation	0	350	\$0	707	0	
<b>Total</b>	<b>28</b>		<b>\$9,800</b>		<b>19796</b>	

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Kagan Stern Marinello & Beard, LLC - Breakdown - Associate 2 (Meagan C. Borgerson)					
Litigation Phase	Total Hours	Rate (Lodestar)	Fees (Lodestar)	Rate (Fitzpatrick)	Fees (Fitzpatrick)
1. Case development, background investigation and case administration	4.3	\$425	\$1,827.50	675	2902.5
2. Pleadings	0.5	\$425	\$212.50	675	337.5
3. Interrogatories, document production, and written discovery	0.3	\$425	\$127.50	675	202.5
4. Depositions	0	\$425	\$0.00	675	0
5. Motions Practice	3.6	\$425	\$1,530.00	675	2430
6. Attending Court Hearings	0	\$425	\$0.00	675	0
7. Trial preparation and post-trial motions	n/a				
8. Attending trial	n/a				
9. ADR	0	\$425	\$0.00	675	0
10. Fee Petition Preparation	0	\$425	\$0.00	675	0
	<b>8.7</b>		<b>\$3,697.50</b>		<b>5872.5</b>

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Kagan Stern Marinello & Beard, LLC - Breakdown - Associate 3 (Veronica J. Mina)					
Litigation Phase	Total Hours	Rate (Lodestar)	Fees (Lodestar)	Rate (Fitzpatrick)	Fees (Fitzpatrick)
1. Case development, background investigation and case administration	2.1	\$350	\$735	581	1220.1
2. Pleadings	0	\$350	\$0	581	0
3. Interrogatories, document production, and written discovery	0.3	\$350	\$105	581	174.3
4. Depositions	0	\$350	\$0	581	0
5. Motions Practice	1	\$350	\$350	581	581
6. Attending Court Hearings	0	\$350	\$0	581	0
7. Trial preparation and post-trial motions	n/a				
8. Attending trial	n/a				
9. ADR	0	\$350	\$0	581	0
10. Fee Petition Preparation	0.2	\$350	\$70	581	116.2
	<b>3.6</b>		<b>\$1,260</b>		<b>2091.6</b>

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

WALTER BLACK III, KEITH BARR, WAYNE  
BEST, and DAVID FANT SR., individually and  
on behalf of all others similarly situated,

*Plaintiffs,*

v.

USAA GENERAL INDEMNITY COMPANY,  
GARRISON PROPERTY AND CASUALTY  
INSURANCE COMPANY, UNITED SERVICES  
AUTOMOBILE ASSOCIATION, USAA  
CASUALTY INSURANCE COMPANY,

*Defendants.*

Case No. 8:21-CV-01581-LKG

**SUPPLEMENTAL DECLARATION OF KAREN KOHN**  
**IN SUPPORT OF PLAINTIFFS' MOTION FOR**  
**AWARD OF ATTORNEYS' FEES AND COSTS AND SERVICE AWARDS**

I, Karen Kohn, declare under penalty of perjury of the laws of the United States as follows:

1. I submit this Supplemental Declaration in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs and Service Awards pursuant to the Court's Order dated April 28, 2026. ECF No. 122. This Supplemental Declaration is based on my personal knowledge and the records of my law firm. If called upon to do so under oath, I could and would testify competently to the matters set forth herein.

2. I am the managing partner at The Kohn Law Group, PLLC, a Washington, D.C. law firm with its office location in Washington, D.C.

3. The Kohn Law Group is aware that this District's Local Rules recognize the Fitzpatrick Matrix as a useful guideline for hourly rates for Washington, D.C. attorneys, like Karen

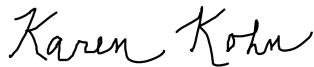
Kohn, and the use of these rates are customary given the location of the law firm being in Washington, D.C.

4. The table included in paragraph 24 of my Declaration in Support of Plaintiffs’ Motion for Award of Attorneys’ Fees and Costs and Service Awards (ECF No. 115-4) included my hours and my rates, and is reproduced below for convenience.

<b>Timekeeper</b>	<b>Professional status/ Law School Grad Yr.</b>	<b>Hours</b>	<b>Fitzpatrick Matrix Rate</b>	<b>Fitzpatrick Matrix Lodestar</b>
Karen Kohn	Partner/ 1994	86.5	\$924	\$79,926.00
<b>The Kohn Law Group total</b>				<b>\$79,926.00</b>

5. The foregoing is true and correct to the best of my knowledge and belief. Executed on April 29, 2026, in Washington, District of Columbia.

Respectfully submitted,



Karen M. Kohn, Bar #12846  
**THE KOHN LAW GROUP, PLLC**  
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UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

WALTER BLACK III, KEITH BARR, WAYNE  
BEST, and DAVID FANT SR., individually and  
on behalf of all others similarly situated,

*Plaintiffs,*

v.

USAA GENERAL INDEMNITY COMPANY,  
GARRISON PROPERTY AND CASUALTY  
INSURANCE COMPANY, UNITED SERVICES  
AUTOMOBILE ASSOCIATION, USAA  
CASUALTY INSURANCE COMPANY,

*Defendants.*

Case No. 8:21-CV-01581-LKG

**SUPPLEMENTAL DECLARATION OF JONATHAN SHUB IN SUPPORT OF  
PLAINTIFFS' UNOPPOSED MOTION FOR AWARD OF ATTORNEYS' FEES AND  
COSTS AND SERVICE AWARDS**

I, Jonathan Shub, declare under penalty of perjury of the laws of the United States as follows:

1. I am a partner at the law firm Shub Johns & Holbrook LLP. My Firm is located in Conshohocken, Pennsylvania. I am co-counsel of record for Plaintiffs in the above-captioned case. I submit this supplemental declaration in support of Plaintiffs' Motion for an Award of Attorneys' Fees, Expenses, and Service Awards pursuant to the Court's Order dated April 28, 2026. ECF No. 122.

2. The hourly rates used to calculate the fees sought for Shub Johns & Holbrook LLP are those set forth in the Fitzpatrick Matrix. I understand that this District's Local Rules recognize these rates as a guideline for reasonable hourly rates for attorneys based in the Washington, DC area. While my firm is not based in the Washington, DC area, the Fitzpatrick Matrix rates are lower

than our regularly used rates. Courts throughout the country have routinely used our regular rates when awarding fees in class action cases to our Pennsylvania-based law firm. *See, e.g., Heath, et al. v. Keenan & Associates*, 24STCV03018 (Cal. Super. Ct.) (attorney’s fees awarded in the amount of \$4,666,200.00); *Bianucci v. Rite Aid Corp.*, No. 2:24-cv-03356-HB (E.D. Pa.) (attorney’s fees awarded in the amount of \$2,380,000.00); *Salinas et al. v. Southwest Louisiana Hospital Association, d/b/a Lake Charles Memorial Health System*, No. 20213-0090 D (La. J. D. Ct.) (attorney’s fees awarded in the amount of \$666,666.66); and *Gravley, Sr. v. Fresenius Vascular Care, Inc.*, No. 2:24-cv-1148 (E.D. Pa) (attorney’s fees awarded in the amount of \$787,500.00).

3. The hours and rates of the timekeepers at Shub Johns & Holbrook LLP who worked on this action are outlined in the following chart:

<b>Timekeeper</b>	<b>Professional status/ Law School Grad Yr.</b>	<b>Hours</b>	<b>Hourly Rate</b>	<b>Ordinary Lodestar</b>	<b>Fitzpatrick Matrix Rate</b>	<b>Fitzpatrick Matrix Lodestar<sup>1</sup></b>
Jonathan Shub	Sr. Partner/1988	51.50	\$1150.00	\$59,225.00	\$933.00	\$48,049.50
<b>Shub Johns &amp; Holbrook Total</b>		51.50		\$59,225.00		\$48,049.50

The foregoing is true and correct to the best of my knowledge and belief. Executed on April 30, 2026 in Aurora, Colorado.

Respectfully submitted,

/s/ Jonathan Shub  
Jonathan Shub

<sup>1</sup> As the Court will note, the use of the Fitzpatrick Matrix results in a lower attorney fee figure.