

**IN THE CIRCUIT COURT OF ST. LOUIS COUNTY  
STATE OF MISSOURI**

---

MICHAEL PREGON, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

STATE FARM FIRE AND CASUALTY  
COMPANY,

Defendant.

---

Case No. 24SL-CC03130

---

**DECLARATION OF CHRISTOPHER E. ROBERTS IN SUPPORT OF PLAINTIFF'S  
UNOPPOSED MOTIONS FOR FINAL APPROVAL OF CLASS SETTLEMENT AND  
FOR AWARD OF ATTORNEYS' FEES, COSTS, AND EXPENSES TO CLASS  
COUNSEL AND SERVICE AWARD TO CLASS REPRESENTATIVE**

---

I, Christopher E. Roberts, hereby declare as follows:

1. I am over the age of 18 years, and I am of sound mind and otherwise competent to make this Declaration. I have personal knowledge of the matters asserted herein.

2. I have appeared as counsel for Plaintiff and Class Representative Michael Pregon ("Plaintiff") in the above-captioned matter. I submit this Declaration in support of Plaintiff's Unopposed Motions for Final Approval of Class Settlement and for Award of Attorneys' Fees, Costs, and Expenses to Class Counsel and Service Award to Class Representative.

3. I am a partner with the firm Butsch Roberts & Associates LLC. I am a member in good standing of the Missouri Bar, and I have never been the subject of any disciplinary proceedings. In addition to being admitted to Missouri, I am also licensed to practice in the States of Illinois and Kansas. Furthermore, I am admitted to practice before the United States Courts of Appeals for the Eighth Circuit, Ninth Circuit, and Tenth Circuit, as well as the United States District Courts for the Northern District of Illinois, Southern District of Illinois, Eastern District

of Missouri, Western District of Missouri, District of Kansas, Southern District of Texas, Northern District of Texas, Eastern District of Michigan, and District of Colorado.

4. I am a 2009 graduate of the University of Missouri-Kansas City School of Law, where I received my Juris Doctor degree. I was admitted to the Missouri Bar in 2009, the Illinois Bar in 2010, and the Kansas Bar in 2010.

5. I frequently speak to members of the Missouri Bar on class action practice and consumer law-related issues. I spoke most recently in 2022 at the Solo and Small Firm Conference sponsored by the Missouri Bar about class action practice and procedure.

6. In addition, I am a frequent contributor to the American Bar Association on class action-related issues. I am the author of a chapter in the 2018, 2020, 2021, 2022, and 2023 books published by the American Bar Association about class action law from each United States Circuit Court of Appeals. The chapter I authored in each publication focuses on class action jurisprudence in the Eighth Circuit. I have also written multiple articles on class action-related issues that have been published by the American Bar Association.

7. Butsch Roberts & Associates LLC is an AV rated law firm that began operating under my law partner, David T. Butsch, on November 1, 2008. The firm specializes in complex civil litigation, with an emphasis on consumer class litigation. The two members of the firm, David T. Butsch and me, have combined litigation experience of more than 40 years.

8. I have been appointed to serve as class counsel in numerous cases and have participated in several cases involving the issue of labor depreciation.

9. I have read the Declaration of my co-counsel, Erik D. Peterson, that was filed contemporaneously with this Declaration. I agree with Mr. Peterson's analysis of the proposed settlement, affirm his factual recitations concerning the negotiations of the proposed settlement,

and recommend without hesitation that the Court grant final approval of the settlement. I believe that the law and facts demonstrate that the settlement is fair, reasonable, and adequate and should be granted final approval.

10. I also request that the Court approve the attorneys' fees, costs, litigation expenses, and service award as detailed in Mr. Peterson's Declaration, all of which are reasonable and appropriate under the circumstances.

Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

FURTHER DECLARANT SAYETH NOT.

*s/ Christopher E. Roberts* \_\_\_\_\_  
CHRISTOPHER E. ROBERTS  
CRoberts@butschroberts.com

February 23, 2026