

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@scc.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF CHRISTIAN
LEVIS IN SUPPORT OF CLASS
COUNSEL'S MOTION FOR AWARD
OF ATTORNEYS' FEES AND
EXPENSES, AND PLAINTIFFS'
APPLICATION FOR SERVICE
AWARDS**

1 I, Christian Levis, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am an attorney duly licensed to practice before the courts of the New York and am
3 admitted *pro hac vice* before this Court. I am a partner with the law firm Lowey Dannenberg, P.C.
4 (“Lowey”) and counsel of record for Plaintiffs and the Class in the above-captioned action (the
5 “Action”). I submit this declaration in support of Class Counsel’s Motion for Award of Attorneys’
6 Fees and Expenses and Plaintiffs’ Application for Service Awards (“Fee and Expense
7 Application”), filed concurrently herewith.

8 2. The statements herein are true to the best of my personal knowledge, information,
9 and belief based on Lowey’s books and records and information received from Lowey attorneys
10 and staff.

11 3. Unless otherwise defined, capitalized terms herein have the same meaning as in the
12 Settlement Agreements between Plaintiffs and Flurry LLC (“Flurry”), Google LLC (“Google”),
13 and Flo Health, Inc. (“Flo”). *See* ECF Nos. 589-2, 820-2, 820-3.

14 4. I have been appointed as Co-Lead Class Counsel for the Plaintiffs and the Class in
15 this matter together with Carol C. Villegas of Labaton Keller Sucharow LLP (“Labaton”) and Diana
16 J. Zinser of Spector Caldes & Corrigan, PC (“SCC”) (collectively referred to as “Class Counsel”).

17 5. The schedules attached as Exhibit A and B of this Declaration summarize Lowey’s
18 hours and lodestar from inception of this Action through July 31, 2025 (when the trial in this Action
19 concluded) and include a breakdown of the hours by category of work. The total hours were
20 determined by the examination of contemporaneous, daily time records regularly prepared and
21 maintained by my firm. Lodestar calculations for the time incurred are based on the firm’s standard
22 current hourly rates and were prepared based upon daily time records maintained by attorneys and
23 professional support staff at the firm. The lodestar figures do not include costs related to expense
24 items. Lowey time records have been reviewed to confirm both the accuracy of the entries as well
25 as the necessity for and reasonableness of the time expended in this litigation. As a result of this
26 review, certain reductions were made to time and lodestar either in the exercise of billing judgment
27 or to conform with the requirements of this matter. Time spent by attorneys and staff who worked

fewer than 10 hours on the case has been omitted from the lodestar calculation. Further, per the Court's Order re Co-Lead Counsel (ECF No. 80), barring unusual circumstances, Lowey has not bill for more than two lawyers attending fact depositions and, for fact depositions where co-counsel also attended, only two attorneys total from among the firms billed for attending. General read/review time for most attorneys has been omitted; only the attorneys designated by Class Counsel to review or summarize pleadings, orders and communications are included in the hours and lodestar calculations.

6. The time set forth in this Declaration does not include any work performed after the conclusion of the jury trial in the Action on July 31, 2025. To the extent there is a fee and expense application submitted in connection with the judgment entered for the jury verdict in this Action achieved against Meta Platforms, Inc. ("Meta"), such application will report the total hours invested in this Action, including all work performed after July 31, 2025.

7. The hourly rates for the attorneys and other professional support staff at my firm are the same as the usual and customary hourly rates used for their services in contingent and non-contingent matters, and have been approved by other courts in similar matters. *See, e.g., Lopez v. Apple, Inc.*, No. 4:19-cv-04577, (N.D. Cal. Oct. 16, 2025), ECF No. 426 (approving fee award with Lowey's rates ranging from \$425 and \$1,650); *Fund Liquidation Holdings LLC v. UBS*, No. 1:15-cv-05844 (S.D.N.Y.), ECF No. 758 (May 6, 2024) (application reporting rates between \$1,500 for partners and \$300 for associates), ECF Nos. 768-769 (June 18, 2024) (granting final approval and fees); *In re European Government Bonds Antitrust Litig.*, No. 1:19-cv-2601 (S.D.N.Y.), ECF No. 423-3 (October 30, 2023) (application including attorney rates ranging from \$365 to \$1,395), ECF No. 487 (April 19, 2024) (approving attorneys' fees); *Hozza v. PrimoHoagies Franchising, Inc.*, No. 1:20-cv-04966 (D.N.J.), ECF No. 61 (November 10, 2022) (data breach class action; application reporting rates between \$1,015 for partners and \$430 for associates), ECF Nos. 70-71 (March 23, 2023) (granting final approval and fees). For personnel no longer employed by Lowey, the lodestar calculation is based on the hourly rates for such personnel in his or her final year of employment.

1 8. The services Lowey performed on behalf of the Class include, but are not limited,
2 the following:

- 3 • Appearing before the Court for oral arguments on Defendants' motion to dismiss,
- 4 discovery disputes, status conferences, Plaintiffs' first motion for class certification,
- 5 preliminary approval of Flurry settlement, *Daubert* motions, and pretrial conferences;
- 6 • Deposing Defendants' fact witnesses and expert witnesses and defending depositions
- 7 for Plaintiffs and their expert witnesses;
- 8 • Working with Plaintiffs' expert witnesses to prepare expert reports;
- 9 • Conducting discovery against Flo, Meta, Google, and Flurry;
- 10 • Conducting third party discovery, serving subpoenas to Yahoo, Procter & Gamble,
- 11 Amplitude, and Bayer and meeting and conferring with their counsel;
- 12 • Drafting Plaintiffs' oppositions to Defendants' motions to dismiss;
- 13 • Drafting Plaintiffs' motions for class certification;
- 14 • Drafting *Daubert* motions relating to Defendants' experts Georgios Zervas, Chris
- 15 Karkanias, Adam Sorini, Leslie Chiou, Lorin Hitt and Amalia Miller;
- 16 • Leading the drafting of oppositions to Defendants' *Daubert* motions with respect to
- 17 Serge Egelman and David Hoffman;
- 18 • Leading the drafting of the opposition to Meta's, Flo's, and Google's motion for
- 19 summary judgment,
- 20 • Opposing Defendant's *Daubert* Motion regarding Jennifer Goldbeck.
- 21 • Drafting multiple discovery motions;
- 22 • Preparing witness lists, exhibit lists, motions in limine, jury instructions, verdict forms,
- 23 trial briefs, and demonstratives for trial, including opening and closing presentations;
- 24 • Drafting outlines for questioning witnesses at trial;
- 25 • Conducting direct and cross examination of technical experts at trial;

26 9. As Class Counsel, I led this action on behalf of Lowey and have been involved in
27 this action since the beginning. I regularly appeared and presented Plaintiffs' arguments before the

1 Court, including at oral argument on Defendants' motions to dismiss, the hearing on Plaintiffs' first
2 motion for class certification, and at oral argument on Plaintiffs' motion for preliminary approval
3 of Flurry's settlement. I also appeared on behalf of Plaintiffs at status conferences and led Plaintiffs
4 at the pretrial conference. My colleague, Amanda Fiorilla also appeared before the Court,
5 presenting Plaintiffs' arguments at discovery dispute hearings and on the *Daubert* motions.

6 10. Ms. Fiorilla and I led discovery efforts against Flo, Google, Meta, and Flurry,
7 handling bi-weekly meet and confers on discovery issues and drafting joint memorandums
8 following each one. We briefed 18 discovery disputes brought to the Court. My firm also reviewed
9 thousands of documents produced by Defendants.

10 11. Ms. Fiorilla and I prepared for and conducted the depositions of 10 fact witnesses,
11 including Flo's 30(b)(6) designee, Susanne Schumacher, CTO Roman Bugaev, VP of Engineering
12 Laure Lydon, Chief Product Officer Max Scrobov, and employee Eugene Tiunovich; Google's
13 30(b)(6) witness Steve Ganem; Flurry 30(b)(6) witness Bisera Ferraro, Product Manager Bradley
14 Jones, and former employee David Lundell; and Yahoo witness Giovanni Gardelli. We also
15 deposed Defendants' experts, Justin McCrary, Chris Karkanias, and Dr. Georgios Zervas twice.
16 We defended the depositions of Plaintiff Erica Frasco and our experts Serge Egelman and Darren
17 Hayes.

18 12. Lowey attorneys worked closely with our expert witnesses in preparation of their
19 affirmative and rebuttal reports during two rounds of expert disclosures and discovery. We took the
20 lead in coordinating with Dr. Serge Egelman for his expert testing and report and substantially
21 contributed to the preparation of Dr. Jennifer Goldbeck's and Dr. David Hoffman's reports.

22 13. In preparation for trial, Lowey contributed significantly to identifying documents to
23 be included on the exhibit list, identifying relevant witnesses, designating deposition testimony to
24 be played at trial, revising the proposed jury instructions, and drafting motions in limine. Lowey
25 prepared scripts for direct and cross examination of multiple adverse witnesses and prepared
26 Plaintiffs for their testimony, as well as the opening and closing demonstratives.

27 14. Significantly, I led the direct and cross examination of the technical expert witnesses

1 at trial, conducting the direct examination of Plaintiffs' Dr. Egelman, and cross-examining
2 Defendants' experts Chris Karkanias and Dr. Zervas.

3 15. The total time for which my firm is requesting an award of legal fees is 18,686.3
4 hours. The total lodestar value of these professional services is \$18,771,187.00.

5 16. Attached as Exhibit C is a schedule of Lowey's expenses reasonably incurred in
6 connection with this Action for which reimbursement is requested. Expense items are recorded
7 separately from the time, and are not duplicated in the firm's current hourly rates. Further, expense
8 items do not contain any general overhead costs, and do not contain a surcharge over the amount
9 incurred.

10 17. As detailed and categorized in the schedule attached as Exhibit C, Lowey incurred
11 and paid \$340,795.03 in expenses from inception through July 31, 2025. The schedule is based
12 upon expense records recorded in Lowey's books and records. These books and records are
13 prepared from expense vouchers, check records, receipts, and other source materials.

14 18. The following is additional information regarding certain of these expenses:

15 a. Work-Related Airfare, Lodging, Meals, Transportation: \$29,756.57. In connection
16 with the prosecution of the Action, Lowey incurred \$1,046.37 in connection with local lodging,
17 transportation and meal costs directly attributable to work on the case. In addition, Lowey paid a
18 total of \$28,710.20 for out-of-town travel expenses related to, among other things, attending court
19 hearings, taking or defending depositions, attendance at case-related meetings, and mediations.
20 Consistent with this Court's Order re Co-Lead Counsel (ECF No. 80), all flight costs for domestic
21 air travel of less than six hours are at coach class fares regardless of the class flown, with only travel
22 exceeding six hours of flight time eligible to be at business class fares. Per diem expenses on travel
23 days were limited to \$125 per person, exclusive of lodging and transportation. A listing of the out-
24 of-town travel trips is set forth in Exhibit D.

25 b. Computer Research, Databases & Docket Fees: \$20,120.96. These costs reflect
26 expenses attributable to the use of Westlaw in connection with the Action. Use of Westlaw services
27 is tracked using a case/client-matter code specific to this Action.

c. Court Transcripts/Court Reporter Fees: \$128.95. Lowey paid for transcripts of the December 22, 2022 and May 15, 2022 court hearings.

d. Litigation Support/Document Hosting: \$222,342.87. Lowey incurred costs to host over 340 gigabytes of documents and data exchanged during discovery on the e-discovery platform Relativity.

e. Expert/Consultant Fees: \$21,625.00. In addition to the costs incurred by the litigation fund established in this case (see below), at the inception of this action, Lowey engaged CodeDetectives LLC to prepare an analysis of the Flo App used in developing the initial complaint in the Action.

f. In-House and Outside Duplicating: \$3,229.96. For in-house duplicating, black and white copies are charged at \$0.20/page and color copies at \$0.90/page. For in-house duplicating, our system required that a case/client-matter code be entered to track the number of pages copied/printed for the case. In addition, Lowey paid a total of \$35.26 for outside printing.

g. Witness, Service and Filing Fees: \$3,251.00. Lowey paid \$1,618.00 for pro hac vice admissions for five attorneys in the Northern District of California; \$500.00 for witness fees to David Lundell, and \$1,133.00 for the service of subpoenas. The subpoena vendors are set forth in Exhibit E.

19. In addition, Lowey contributed to the litigation fund established by Class Counsel for the payment of certain expenses of the Action, including expenses related to experts and preparation for trial. Labaton Keller Sucharow LLP will report the expenses incurred by the litigation fund.

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

Executed this 20th day of August 2026, at White Plains, New York.

/s/ Christian Levis
Christian Levis

EXHIBIT A – Lodestar by Timekeeper
Time Period: Inception through July 31, 2025

Attorneys	Role	Total Hours	Hourly Rate	Total Lodestar
Vincent Briganti	P	325.8	\$1,795	\$584,811.00
Geoffrey Horn	P	154.4	\$1,795	\$277,148.00
Christian Levis	P	2,472.9	\$1,395	\$3,449,695.50
Margaret MacLean	P	309.0	\$1,395	\$431,055.00
Laura Mummert	P	73.6	\$1,395	\$102,672.00
Roland St. Louis	P	55.4	\$1,395	\$77,283.00
Sitso Bediako	P	114.4	\$1,395	\$159,588.00
Amanda Fiorilla	P	3,257.6	\$1,395	\$4,544,352.00
Andrew Sacher	OC	768.8	\$1,150	\$884,120.00
Frank Strangeman	SA	501.2	\$995	\$498,694.00
Alexis Castillo	SA	418.6	\$1,250	\$523,250.00
Anthony Christina	SA	128.8	\$895	\$115,276.00
Jennifer Tembeck	SA	740.8	\$830	\$614,864.00
John D'Amico	SA	413.9	\$895	\$370,440.50
Peter Demato	SA	35.7	\$1,250	\$44,625.00
Charles Kopel	SA	63.5	\$830	\$52,705.00
Noelle Forde	SA	115.7	\$1,250	\$144,625.00
James Pedersen	A	39.5	\$490	\$19,355.00
Luke Goveas	A	24.5	\$525	\$12,862.50
Yuanchen Lu	A	1,220.7	\$725	\$885,007.50
William Olson	A	165.8	\$675	\$111,915.00
Rachel Kesten	A	1,741.8	\$725	\$1,262,805.00
Megan McKenzie	A	343.8	\$675	\$232,065.00
Sylvie Bourassa	A	1,069.8	\$675	\$722,115.00
Christopher Devivo	A	497.0	\$490	\$243,530.00
Radhika Gupta	A	99.6	\$895	\$89,142.00
Vincent Capucci	A	1,304.6	\$675	\$880,605.00

Katherine Boyd	A	1,030.1	\$675	\$695,317.50
Peyton Woodward	A	186.3	\$725	\$135,067.50
Nicholas Alicata	A	292.4	\$590	\$172,516.00
Delaram Rezaeikhonakdar	A	430.0	\$590	\$253,700.00
Alesandra Greco	A	216.3	\$675	\$146,002.50
SUBTOTAL:		18,612.3		\$18,737,209.50

Non-Attorneys	Role	Total Hours	Hourly Rate	Total Lodestar
Katherine Vogel	SPL	43.5	\$470	\$20,445.00
Brenda Diaz	SPL	19.8	\$470	\$9,306.00
Myra Frumholz	SPL	10.7	\$395	\$4,226.50
SUBTOTAL:		74.0		\$33,977.50
GRAND TOTAL		18,686.3		\$18,771,187.00

Key:

(P) Partner

(OC) Of Counsel

(SA) Senior Associate

(A) Associate

(SPL) Senior Paralegal

EXHIBIT B – Hours by Category*Lowey Dannenberg, P.C. | Inception through July 31, 2025 | 2026 hourly rates***Task Code Categories**

(1) Investigation	(6) Court Appearances	(11) Trial Prep & Trial
(2) Pleadings	(7) Expert Discovery (incl. consultants)	(12) Appeal
(3) Discovery Produced by Defendants	(8) Mediation	(13) Litigation Strategy & Analysis
(4) Discovery Produced by Plaintiffs	(9) Settlement	(14) Case Management
(5) Motions & Legal Research	(10) Class Certification	

Name	Role	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total Hours	Current Rate	Lodestar
ATTORNEYS																		
Vincent Briganti	P	3.0					3.6	73.5		13.9	5.3	17.4		209.1		325.8	\$1,795.00	\$584,811.00
Geoffrey Horn	P			0.5					8.9	35.1	19.1	13.5		68.6	8.7	154.4	\$1,795.00	\$277,148.00
Christian Levis	P	1.1	25.6	471.7	197.6	423.5	131.1	272.0	94.1	62.8	164.9	394.9	28.8	159.9	44.9	2,472.9	\$1,395.00	\$3,449,695.50
Margaret MacLean	P					64.5		151.5		1.0	45.0		42.0	5.0		309.0	\$1,395.00	\$431,055.00
Laura Mummert	P					4.8		61.3						7.5		73.6	\$1,395.00	\$102,672.00
Roland St. Louis	P					24.2								31.2		55.4	\$1,395.00	\$77,283.00
Sitso Bediako	P					6.6				77.2	27.9			2.2	0.5	114.4	\$1,395.00	\$159,588.00
Amanda Fiorilla	P	13.2	51.5	741.8	454.1	767.3	135.4	243.4	98.7	20.5	159.8	402.1	17.8	100.7	51.3	3,257.6	\$1,395.00	\$4,544,352.00
Andrew Sacher	OC			28.2		63.9		17.6	13.0	6.3	5.3	556.7		74.5	3.3	768.8	\$1,150.00	\$884,120.00
Frank Strangeman	SA					67.9		245.1		0.2		179.4		8.6		501.2	\$995.00	\$498,694.00
Alexis Castillo	SA					16.4		3.6		0.9	0.2	381.1	0.5	15.9		418.6	\$1,250.00	\$523,250.00
Anthony Christina	SA					37.0		77.8						14.0		128.8	\$895.00	\$115,276.00
Jennifer Tembeck	SA			249.4		137.7		90.3	95.9			92.7		74.8		740.8	\$830.00	\$614,864.00
John D'Amico	SA			60.6		199.0		0.3				147.5		6.5		413.9	\$895.00	\$370,440.50
Peter Demato	SA			11.2		16.5								8.0		35.7	\$1,250.00	\$44,625.00
Charles Kopel	SA			15.8	3.0	12.6		9.1			15.6			6.7	0.7	63.5	\$830.00	\$52,705.00
Noelle Forde	SA			8.1	12.6	9.2		81.2			2.5			2.1		115.7	\$1,250.00	\$144,625.00
James Pedersen	A		18.2		4.3	17.0										39.5	\$490.00	\$19,355.00
Luke Goveas	A					24.5										24.5	\$525.00	\$12,862.50
Yuanchen Lu	A			336.4	109.3	424.4	26.2	51.5	6.6	19.4	140.5	35.2	28.5	35.4	7.3	1,220.7	\$725.00	\$885,007.50
William Olson	A			103.7				48.1			10.4			3.6		165.8	\$675.00	\$111,915.00
Rachel Kesten	A		0.6	478.5	198.3	315.7	16.2	95.2	6.9	31.2	70.8	423.4		60.8	44.2	1,741.8	\$725.00	\$1,262,805.00
Megan McKenzie	A			120.4		15.0		56.4	2.5			99.5		47.5	2.5	343.8	\$675.00	\$232,065.00
Sylvie Bourassa	A			683.0	22.9	87.6		4.8			73.7	180.3		17.5		1,069.8	\$675.00	\$722,115.00
Christopher Devivo	A			259.5	52.0	92.0		17.0	9.0		66.5				1.0	497.0	\$490.00	\$243,530.00
Radhika Gupta	A			5.0		32.6		47.5		2.0	6.0	0.5		6.0		99.6	\$895.00	\$89,142.00
Vincent Capucci	A			1.0	17.5	340.5		655.6				276.0		14.0		1,304.6	\$675.00	\$880,605.00
Katherine Boyd	A			447.0	110.3	260.1	16.6	44.0		11.6	113.5	15.0		8.9	3.1	1,030.1	\$675.00	\$695,317.50
Peyton Woodward	A			0.9		19.5	1.0	8.2				142.2		13.9	0.6	186.3	\$725.00	\$135,067.50

Name	Role	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total Hours	Current Rate	Lodestar
Nicholas Alicata	A			44.6	4.9	13.9		3.2		1.2		201.1		22.6	0.9	292.4	\$590.00	\$172,516.00
Delaram Rezaeikhonakdar	A			58.1		286.5		2.4	2.7	3.4		13.8		63.0	0.1	430.0	\$590.00	\$253,700.00
Alesandra Greco	A			123.5		81.5								11.3		216.3	\$675.00	\$146,002.50
Sub-total — Attorneys		17.3	95.9	4,248.9	1,186.8	3,861.9	330.1	2,360.6	338.3	286.7	927.0	3,572.3	117.6	1,099.8	169.1	18,612.3		\$18,737,209.50
NON-ATTORNEYS																		
Katherine Vogel	SPL			1.5	1.0	8.1	0.4				0.8	26.2	2.5	0.8	2.2	43.5	\$470.00	\$20,445.00
Brenda Diaz	SPL					15.3				0.7		3.8				19.8	\$470.00	\$9,306.00
Myra Frumholz	SPL			2.1	2.4	3.9					0.6			0.8	0.9	10.7	\$395.00	\$4,226.50
Sub-total — Non-Attorneys				3.6	3.4	27.3	0.4			0.7	1.4	30.0	2.5	1.6	3.1	74.0		\$33,977.50
GRAND TOTAL		17.3	95.9	4,252.5	1,190.2	3,889.2	330.5	2,360.6	338.3	287.4	928.4	3,602.3	120.1	1,101.4	172.2	18,686.3		\$18,771,187.00

Role Key

(P) Partner

(OC) Of Counsel

(SA) Senior Associate

(A) Associate

(SPL) Senior Paralegal

EXHIBIT C – Firm Expenses

Time Period: Inception through July 31, 2025

Expense Categories	Expenses
Outside Duplicating	\$35.26
In-House Duplicating/Printing	\$3,194.70
Witness/Service/Filing Fees	\$3,251.00
Court & Deposition Reporting/Transcripts	\$128.95
Computer Research/Databases/Docket Fees	\$20,120.96
Long Distance Telephone/Conference Calling	\$89.21
Postage/Overnight Mail/Messenger	\$250.51
Expert/Consultant Fees	\$21,625.00
Litigation Support/Document Hosting	\$222,342.87
Travel (air/ground transportation, meals, hotel)	\$28,710.20
Local Work-Related Transportation/Meals	\$1,046.37
TOTAL	\$300,795.03

EXHIBIT D

Out of Town Travel - Airfare, Lodging, Meals, Taxi: \$28,710.20

<u>Name</u>	<u>Date</u>	<u>Destination/Location</u>	<u>Purpose</u>
Amanda Fiorilla	5/4/2022 – 5/6/2022	San Francisco, CA	5/5/22 Motion to dismiss hearing – travel and hotel
Amanda Fiorilla	5/4/2022 – 5/6/2022	San Francisco, CA	5/5/22 Motion to dismiss hearing Ground transportation to/from airports and meal
Christian Levis	5/4/2022 – 5/6/2022	San Francisco, CA	5/5/22 Motion to dismiss hearing Motion to dismiss hearing
Amanda Fiorilla	12/21/2022 – 12/23/2022	San Francisco, CA	12/22/22 Discovery Hearing
Christian Levis	12/21/2022 – 12/23/2022	San Francisco, CA	12/22/22 Discovery Hearing
Christian Levis	2/15/2023	Delray Beach, Florida	Deposition
Amanda Fiorilla	2/21/2024 - 2/29/2024	San Francisco, CA	2/22/24 Hearing on plaintiffs' motion for class certification and defendant Google's motion for summary judgment
Christian Levis	2/21/2024 - 2/22/2024	San Francisco, CA	2/22/24 Hearing on plaintiffs' motion for class certification and defendant Google's motion for summary judgment
Christian Levis	6/20/2024	San Francisco, CA	6/20/24 Hearing (cancelled) - non-refundable costs
Amanda Fiorilla	10/2/2024	San Francisco, CA	10/3/24 Hearing (cancelled) - non-refundable costs
Amanda Fiorilla	10/27/2024 - 10/31/2024	San Francisco, CA	In-person mediation
Christian Levis	10/27/2024 - 10/31/2024	San Francisco, CA	In-person mediation
Christian Levis	11/6/2024 - 11/8/2024	San Francisco, CA	In-person mediation

Christian Levis	11/19/2024	San Francisco, CA	11/21/24 Hearing (cancelled) - non-refundable travel costs
Amanda Fiorilla	5/14/2025 - 5/17/2025	San Francisco, CA	5/15/25 Preliminary Approval Hearing and Hearing on Motions to Exclude Expert Witnesses
Christian Levis	5/14/2025 - 5/18/2025	San Francisco, CA	5/15/25 Preliminary Approval Hearing and Hearing on Motions to Exclude Expert Witnesses
Alexis Castillo	6/29/2025 - 6/30/2025	Columbus, OH	Trial preparation with Plaintiff

EXHIBIT E

Service Fees: \$1,133.00

<u>Date</u>	<u>Vendor</u>	<u>Purpose</u>
03/09/2023	Hoosier Process Service LLC (reimbursement of employee charge)	Subpoena service
03/09/2023	Greentree Legal LLC (reimbursement of employee charge)	Subpoena service
04/19/2023	Intercounty Judicial Services	Subpoena service
05/02/2023	Intercounty Judicial Services	Subpoena service

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@scc.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF CAROL C.
VILLEGAS IN SUPPORT OF CLASS
COUNSEL'S MOTION FOR AWARD
OF ATTORNEYS' FEES AND
EXPENSES, AND PLAINTIFFS'
APPLICATION FOR SERVICE
AWARDS**

1 I, Carol C. Villegas, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as
2 follows:

3 1. I am an attorney duly licensed to practice before the courts of the State of New
4 York and am admitted *pro hac vice* before this Court. I am a partner with the law firm of Labaton
5 Keller Sucharow LLP (“Labaton”) and counsel of record for Plaintiffs Madeline Kiss and Sarah
6 Wellman in the above-captioned action (the “Action”). I submit this declaration in support of Class
7 Counsel’s Motion for Award of Attorneys’ Fees and Expenses, and Plaintiffs’ Application for
8 Service Awards (“Fee and Expense Application”) filed concurrently herewith.

9 2. The statements herein are true to the best of my personal knowledge, information,
10 and belief based on the books and records of Labaton and information received from Labaton
11 attorneys and staff.

12 3. Unless otherwise defined, capitalized terms herein have the same meaning as in the
13 Settlement Agreements between Plaintiffs and Flurry LLC (“Flurry”), Google LLC (“Google”),
14 and Flo Health, Inc. (“Flo”). *See* ECF Nos. 589-2, 820-2, 820-3.

15 4. I have been appointed as Co-Class Counsel for the Plaintiffs and the Class in this
16 matter, together with Christian Levis of Lowey Dannenberg, P.C. (“Lowey”) and Diana J. Zinser
17 of Spector Caldes & Corrigan, PC (“SCC”) (collectively referred to as “Class Counsel”).

18 5. For purposes of this Fee and Expense Declaration, the schedules attached as Exhibit
19 A and B summarize the hours and lodestar of Labaton from inception of this Action through July
20 31, 2025 (when the trial in this Action concluded) and include a breakdown of the hours by
21 category of work. The total hours were determined by the examination of contemporaneous, daily
22 time records regularly prepared and maintained by my firm. Lodestar calculations for the time
23 incurred are based on the firm’s standard current hourly rates and were prepared based upon daily
24 time records maintained by attorneys and professional support staff at the firm. The lodestar figures
25 do not include costs related to expense items. Labaton time records have been reviewed to confirm
26 both the accuracy of the entries as well as the necessity for and reasonableness of the time
27 expended in this litigation. As a result of this review, certain reductions were made to time and

1 lodestar either in the exercise of “billing judgment” or to conform with the requirements of this
2 matter. Time spent by attorneys and staff who worked fewer than 10 hours on the case has been
3 omitted from the lodestar calculation. Further, per the Court’s Order re Co-Lead Counsel (ECF
4 No. 80), barring unusual circumstances, the time of no more than two lawyers from the firm for
5 attendance at most fact depositions has been included, and general read/review time for most
6 attorneys has been omitted; only the attorneys designated by Class Counsel to review or summarize
7 pleadings, orders and communications are included in the hours and lodestar calculations.

8 6. The time set forth in this Declaration does not include any work performed after
9 the conclusion of the jury trial in the Action on or around July 31, 2025. To the extent there is a
10 fee and expense application submitted in connection with the judgment entered for the jury verdict
11 in this Action against Meta Platforms, Inc. (“Meta”), such application will report the total hours
12 invested in this Action, including work performed after July 31, 2025.

13 7. The hourly rates for the attorneys and other professional support staff at my firm
14 are the same as the usual and customary hourly rates used for their services in other contingent
15 matters, and have been approved by other courts. *See Vazquez v. Masimo Corporation, et al.*, No.
16 3:23-cv-010546-DEB, ECF No. 106 (S.D. Cal.); *Wu v. GSX Techedu, Inc., et al.*, Case No. 2:20-
17 CV-04457, ECF No. 181 (D.N.J.). For personnel no longer employed by Labaton, the lodestar
18 calculation is based on the hourly rates for such personnel in his or her final year of employment.

19 8. With respect to the services Labaton performed on behalf of the Class, the
20 following attorneys had key roles during the course of the litigation: myself, Michael Canty, Jake
21 Bissell-Linsk, Thomas Hoffman, David Saldamando, Danielle Izzo Mazzeo, and Gloria Medina.
22 I was appointed interim Co-Lead Counsel for the Class. I, along with Mr. Canty, also served as
23 co-lead trial counsel during the two-week trial of the claims against Flo and Meta. All Labaton
24 attorneys were involved in the investigation of the claims, drafting pleadings, drafting and arguing
25 motions and substantive filings, opposing motions, seeking and reviewing discovery, attending
26 hearings, preparing for trial, and litigating the case through trial to the jury verdict. Labaton had
27 primary responsibility for the efforts to certify the Class, opposing Meta’s summary judgment

1 motion, and working with testifying experts Dr. Serge Egelman and Dr. Jennifer Golbeck. Many
 2 of us continue to work on matters related to the judgment against Meta.

3 9. The total time for which my firm is requesting an award of legal fees is 17,248.8
 4 hours. The total lodestar value of these professional services is \$12,548,861.00.

5 10. Attached as Exhibit C is a schedule of Labaton's expenses reasonably incurred in
 6 connection with this Action for which payment is requested. Expense items are recorded separately
 7 from time, and are not duplicated in the firm's hourly rates. Further, expense items do not contain
 8 any general overhead costs, and do not contain a surcharge.

9 11. As detailed and categorized in the schedule attached as Exhibit C, Labaton incurred
 10 a total of \$236,258.82 in expenses from inception through July 31, 2025. The schedule is based on
 11 expense records recorded in Labaton's books and records. These books and records are prepared
 12 from expense vouchers, check records, receipts, and other source materials.

13 12. The following is additional information regarding certain of these expenses:

14 a. **Work-Related Airfare, Lodging, Meals, Transportation:** \$98,844.57. In
 15 connection with the prosecution of the Action, Labaton incurred \$10,580.00 in connection with
 16 local transportation and meal costs directly attributable to work on the case. In addition, Labaton
 17 incurred a total of \$88,264.57 in connection with travel expenses related to, among other things,
 18 attending court hearings, taking or defending depositions, attendance at case-related meetings,
 19 mediations, and trial. Consistent with the Court's Order re Co-Lead Counsel (ECF No. 80), and
 20 Labaton's practices, all flight costs are either at coach class fares or have been reduced to be
 21 comparable to coach class fares regardless of the class flown. Per diem expenses on travel days
 22 have been limited to \$125 per person, exclusive of lodging and transportation. A listing of the out-
 23 of-town travel trips is set forth in Exhibit D.

24 b. **Computer Research, Databases & Docket Fees:** \$70,565.80. These costs reflect
 25 expenses attributable to the use of Lexis, Westlaw, PACER, electronic publication resources, and
 26 factual databases used in connection with the Action.

27 c. **Court Reporting & Transcripts:** \$1,119.14. The vendors paid by Labaton to

1 provide court reporting and transcript services are listed in Exhibit E. The costs of the many
 2 depositions in the case were managed through the Joint Litigation Fund maintained by Labaton,
 3 which is discussed below.

4 d. **Expert/Consultant Fees:** \$11,875.00. In addition to the costs incurred by the Joint
 5 Litigation Fund, discussed below, Labaton paid the fees of three consulting experts who provided
 6 expertise and analysis with respect to: the use of app data for optimization and advertising; the
 7 transmission of Flo data; privacy disclosure standards; and the women's health app industry.

8 i. Marketing Data Value - \$6,000.00

9 ii. Privacy Disclosure Standards -\$1,500.00

10 iii. Women's Health App Industry - \$4,375.00

11 e. **Mediation Fees:** \$27,500.00. In connection with an earlier stage of the case, Class
 12 Counsel consulted with a private mediator about the possibility of a negotiated resolution of the
 13 claims. However, mediation efforts instead proceeded with Magistrate Judge Hixson and retired
 14 Ambassador Jeffrey Bleich.

15 f. **In-House & Outside Duplicating/Printing:** \$13,039.69. In connection with this
 16 case, Labaton printed 16,118 black and white pages at \$0.20/page and 22,829 color pages at
 17 \$0.40/page, for a total of \$12,355.20. For in-house duplicating, our system requires that a
 18 case/client-matter code be entered to track the number of pages copied/printed for the case. In
 19 addition, Labaton paid a total of \$684.49 to outside vendors to produce copies and other visuals.
 20 The vendors paid to provide these services are listed in Exhibit F.

21 g. **Witness, Service & Filing Fees:** \$11,773.53. Labaton paid costs related to *pro hac*
 22 *vice* admissions, service of summonses and other court documents, and courtesy copies. The
 23 vendors paid are set forth in Exhibit G.

24 13. To manage the payment of certain expenses of the Action, including expenses
 25 related to depositions, experts and the trial, Class Counsel contributed to a joint litigation expense
 26 fund (the "Joint Litigation Fund" or the "Litigation Fund"), which was maintained by Labaton.
 27 The expenses incurred by the Joint Litigation Fund are reported in Exhibit C-1, attached hereto,

and they total \$1,452,511.99. The following is additional information regarding certain of the Litigation Fund expenses:

a. **Deposition Transcription & Videography:** \$208,173.54. These are the costs related to the more than two dozen depositions taken in the case. Veritext Legal Solutions was the primary deposition vendor in the case.

b. **Testifying Experts:** \$764,118.05. These are the costs and fees of Plaintiffs' testifying experts, each of whom produced reports and were deposed. Dr. Serge Egelman and Dr. Jennifer Golbeck testified at trial.

i. David A. Hoffman, Privacy Disclosure Standards/Data Valuation - \$200,000

ii. Serge Egelman, Mobile and Web Application Analytics - \$285,851.93

iii. Jennifer Golbeck, Machine Learning and Algorithm Design - \$278,266.12

c. **Jury Focus Group Consultants:** \$123,597.31. These are the costs and fees of Plaintiffs' primary jury and trial consultants.

b. **Mediation Fees:** \$95,000.00. These are the costs and fees of retired Ambassador Jeffrey Bleich.

d. **Hotel – Trial:** \$196,253.93. These are the costs related to the trial team's relocation to San Francisco, California for the trial and establishing a "war room" at the hotel where the team stayed.

i. Lodging - \$76,956.16

ii. War Room Rental - \$55,229.09

iii. Equipment - \$43,509.45

iv. Mailroom Rental - \$19,088.28

v. Hotel Meals - Class Representatives - \$1,470.95

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of August, 2026.


CAROL C. VILLEGAS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

EXHIBIT A

EXHIBIT A – Lodestar by Timekeeper
Time Period: Inception through July 31, 2025

Attorneys	Role	Total Hours	Current Hourly Rate	Total Lodestar
Gardner, J.	Partner	85.5	\$1,450	\$123,975.00
Belfi, E.	Partner	53.4	\$1,400	\$74,760.00
Keller, C.	Partner	32.0	\$1,375	\$44,000.00
Villegas, C.	Partner	2,261.0	\$1,300	\$2,939,300.00
Canty, M.	Partner	889.8	\$1,300	\$1,156,740.00
Zeiss, N.	Partner	109.2	\$1,250	\$136,500.00
Fox, C.	Partner	36.9	\$1,200	\$44,280.00
Hoffman, T.	Partner	221.6	\$1,150	\$254,840.00
Bissell-Linsk, J.	Partner	1,053.1	\$975	\$1,026,772.50
Nafash, M.	Partner	57.0	\$975	\$55,575.00
Rosenberg, E.	Of Counsel	15.5	\$1,025	\$15,887.50
Cividini, D.	Of Counsel	294.9	\$950	\$280,155.00
Kamhi, R.	Of Counsel	273.7	\$850	\$232,645.00
Wood, C.	Associate	134.4	\$650	\$87,360.00
Mazzeo, D.	Associate	2,113.6	\$600	\$1,268,160.00
Saldamando, D.	Associate	1,779.9	\$600	\$1,067,940.00
Medina, G.	Associate	1,037.4	\$575	\$596,505.00
Hotz, M.	Associate	83.7	\$550	\$46,035.00
Mann, W.	Associate	31.6	\$425	\$13,430.00
Coyle, J.	Associate	26.9	\$425	\$11,432.50
Yu, N.	Associate	21.3	\$425	\$9,052.50
Urbinati, J.	Associate	95.0	\$400	\$38,000.00
Kendall, A.	Staff Attorney	1,093.7	\$525	\$574,192.50
Gaskill, W.	Staff Attorney	109.2	\$475	\$51,870.00
Haque, N.	Staff Attorney	11.8	\$475	\$5,605.00
Gonzalez, O.	Staff Attorney	21.3	\$455	\$9,691.50
Carty, K.	Staff Attorney	1,380.3	\$440	\$607,332.00
TOTAL:		13,323.7		\$10,772,036.00

Non-Attorneys	Role	Total Hours	Current Hourly Rate	Total Lodestar
Greenbaum, A.	Investigator	96.7	\$700	\$67,690.00
Rutherford, C.	Investigator	58.4	\$575	\$33,580.00
Frenkel, G.	Investigator	170.4	\$550	\$93,720.00
Megibow, S.	Investigator	18.0	\$550	\$9,900.00
Brecher, D.	Investigator	12.1	\$550	\$6,655.00
Judd, K.	Paralegal	748.0	\$455	\$340,340.00

Non-Attorneys	Role	Total Hours	Current Hourly Rate	Total Lodestar
Donlon, N.	Paralegal	724.0	\$455	\$329,420.00
Boria, C.	Paralegal	12.5	\$455	\$5,687.50
Hausman, J.	Paralegal	12.1	\$455	\$5,505.50
Malonzo, F.	Paralegal	130.2	\$445	\$57,939.00
Vibar, V.	Paralegal	1,525.9	\$440	\$671,396.00
Franklin, T.	Paralegal	32.5	\$440	\$14,300.00
Molloy, M.	Paralegal	15.4	\$440	\$6,776.00
Manzolillo, S.	Paralegal	190.7	\$390	\$74,373.00
Pina, E.	Paralegal	71.3	\$375	\$26,737.50
Gonzalez, J.	Paralegal	22.7	\$375	\$8,512.50
McLaughlin, E.	Paralegal	38.2	\$365	\$13,943.00
Richardson, A.	Paralegal	46.0	\$225	\$10,350.00
TOTAL:		3,925.1		\$1,776,825.00

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

EXHIBIT B

EXHIBIT B – Hours by Category
Time Period: Inception through July 31, 2025

Categories: (1) Investigation (2) Pleadings (3) Discovery Produced by Defendants (4) Discovery Produced by Plaintiffs (5) Motions & Legal Research (6) Court Appearances (7) Expert Discovery (incl. consultants) (8) Mediation (9) Settlement (10) Class Certification (11) Trial Prep & Trial (12) Appeal (13) Litigation Strategy & Analysis (14) Case Management																		
Name	Position	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total Hours	Current Rate	Lodestar
Gardner, J.	(P)	5.70	-	-	-	-	-	-	38.80	-	2.20	5.20	-	32.80	0.80	85.5	\$1,450	\$123,975.00
Belfi, E.	(P)	-	-	-	-	-	-	-	38.20	9.20	-	4.00	-	2.00	-	53.4	\$1,400	\$74,760.00
Keller, C.	(P)	8.00	-	-	-	8.50	-	-	-	-	-	-	-	15.50	-	32.0	\$1,375	\$44,000.00
Villegas, C.	(P)	9.00	41.50	363.70	61.20	291.90	59.10	164.60	138.60	8.80	73.40	966.30	-	37.70	45.20	2,261.0	\$1,300	\$2,939,300.00
Canty, M.	(P)	90.00	1.20	7.90	1.60	9.20	24.80	0.40	121.00	2.10	2.60	564.60	1.00	63.40	-	889.8	\$1,300	\$1,156,740.00
Zeiss, N.	(P)	-	-	-	-	-	-	-	-	96.90	10.90	-	-	0.60	0.80	109.2	\$1,250	\$136,500.00
Fox, C.	(P)	-	-	0.30	-	-	-	12.50	-	18.10	2.10	3.50	-	0.40	-	36.9	\$1,200	\$44,280.00
Hoffman, T.	(P)	-	-	1.00	-	0.30	-	-	-	-	-	218.80	-	1.50	-	221.6	\$1,150	\$254,840.00
Bissell-Linsk, J.	(P)	5.50	10.50	131.10	20.80	48.60	8.00	187.50	82.60	0.80	14.00	437.20	-	105.00	1.50	1,053.1	\$975	\$1,026,772.50
Nafash, M.	(P)	2.10	14.90	0.50	-	14.90	-	-	-	-	0.70	-	-	5.70	18.20	57.0	\$975	\$55,575.00
Rosenberg, E.	(OC)	-	-	-	-	-	-	-	-	15.50	-	-	-	-	-	15.5	\$1,025	\$15,887.50
Cividini, D.	(OC)	-	-	191.90	93.90	-	-	-	-	-	-	2.40	-	6.70	-	294.9	\$950	\$280,155.00
Kamhi, R.	(OC)	61.10	69.30	38.70	0.20	86.80	-	1.90	-	-	-	-	-	11.40	4.30	273.7	\$850	\$232,645.00
Wood, C.	(A)	0.70	13.50	-	-	118.70	-	-	-	-	-	-	-	1.50	-	134.4	\$650	\$87,360.00
Mazzeo, D.	(A)	25.70	-	247.10	142.90	717.80	-	195.90	143.60	9.70	13.00	251.20	-	364.20	2.50	2,113.6	\$600	\$1,268,160.00
Saldamando, D.	(A)	16.40	68.70	622.40	35.70	300.50	20.00	192.40	39.80	2.10	37.00	193.60	-	103.10	148.20	1,779.9	\$600	\$1,067,940.00
Medina, G.	(A)	0.50	-	3.80	8.80	134.10	29.10	58.00	51.30	1.10	28.40	693.20	-	24.40	4.70	1,037.4	\$575	\$596,505.00
Hotz, M.	(A)	2.00	-	9.70	-	49.10	-	10.50	-	3.20	-	7.30	-	0.50	1.40	83.7	\$550	\$46,035.00
Mann, W.	(A)	-	-	5.00	-	7.60	-	-	-	-	19.00	-	-	-	-	31.6	\$425	\$13,430.00
Coyle, J.	(A)	-	-	-	-	20.40	-	-	-	-	-	6.50	-	-	-	26.9	\$425	\$11,432.50

iii

DECLARATION OF CAROL C. VILLEGAS IN SUPPORT OF CLASS COUNSEL'S MOTION FOR
ATTORNEYS' FEES AND EXPENSES AND PLAINTIFFS' APPLICATION FOR SERVICE AWARDS
CASE NO. 3:21-CV-00757-JD

Categories: (1) Investigation (2) Pleadings (3) Discovery Produced by Defendants (4) Discovery Produced by Plaintiffs (5) Motions & Legal Research (6) Court Appearances (7) Expert Discovery (incl. consultants) (8) Mediation (9) Settlement (10) Class Certification (11) Trial Prep & Trial (12) Appeal (13) Litigation Strategy & Analysis (14) Case Management																		
Name	Position	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total Hours	Current Rate	Lodestar
Yu, N.	(A)	-	-	-	-	20.90	-	-	-	-	-	-	-	0.40	-	21.3	\$425	\$9,052.50
Urbinati, J.	(A)	-	-	-	-	-	-	-	-	-	-	95.00	-	-	-	95.0	\$400	\$38,000.00
Kendall, A.	(SA)	-	-	1,038.00	-	-	-	-	-	-	-	55.20	-	0.50	-	1,093.7	\$525	\$574,192.50
Gaskill, W.	(SA)	-	-	6.20	-	-	-	15.50	-	-	-	87.50	-	-	-	109.2	\$475	\$51,870.00
Haque, N.	(SA)	-	-	11.80	-	-	-	-	-	-	-	-	-	-	-	11.8	\$475	\$5,605.00
Gonzalez, O.	(SA)	-	-	-	-	-	-	-	-	-	-	20.60	-	-	0.70	21.3	\$455	\$9,691.50
Carty, K.	(SA)	-	-	1,378.90	0.30	-	-	-	-	-	-	-	-	1.10	-	1,380.3	\$440	\$607,332.00
Greenbaum, A.	(I)	72.20	-	2.90	3.80	-	-	-	-	-	-	11.50	-	6.30	-	96.7	\$700	\$67,690.00
Rutherford, C.	(I)	58.20	-	-	-	-	-	-	-	-	-	-	-	0.20	-	58.4	\$575	\$33,580.00
Frenkel, G.	(I)	169.10	-	-	-	-	-	-	-	-	-	-	-	1.30	-	170.4	\$550	\$93,720.00
Megibow, S.	(I)	14.20	-	-	-	-	-	-	-	-	-	3.80	-	-	-	18.0	\$550	\$9,900.00
Brecher, D.	(I)	12.10	-	-	-	-	-	-	-	-	-	-	-	-	-	12.1	\$550	\$6,655.00
Judd, K.	(PL)	-	-	16.70	41.00	140.70	1.20	112.50	37.70	0.50	42.50	320.50	27.30	2.50	4.90	748.0	\$455	\$340,340.00
Donlon, N.	(PL)	3.20	29.90	67.10	17.50	137.00	5.10	124.00	55.60	1.40	45.70	185.80	34.00	9.10	8.60	724.0	\$455	\$329,420.00
Boria, C.	(PL)	-	-	-	-	8.00	-	4.50	-	-	-	-	-	-	-	12.5	\$455	\$5,687.50
Hausman, J.	(PL)	-	8.90	-	-	0.20	-	-	-	-	-	3.00	-	-	-	12.1	\$455	\$5,505.50
Malonzo, F.	(PL)	1.80	27.80	17.90	-	63.00	-	-	-	-	-	6.60	-	-	13.10	130.2	\$445	\$57,939.00
Vibar, V.	(PL)	5.50	1.40	1.40	20.40	324.40	-	47.80	65.80	-	18.30	979.20	3.00	21.80	36.90	1,525.9	\$440	\$671,396.00
Franklin, T.	(PL)	-	-	-	-	-	-	-	-	-	-	-	-	-	32.50	32.5	\$440	\$14,300.00
Molloy, M.	(PL)	-	-	-	-	-	-	14.30	-	-	-	-	-	-	1.10	15.4	\$440	\$6,776.00
Manzolillo, S.	(PL)	20.10	3.10	62.10	36.30	48.70	-	4.90	-	-	-	-	-	9.80	5.70	190.7	\$390	\$74,373.00
Pina, E.	(PL)	-	-	-	-	71.30	-	-	-	-	-	-	-	-	-	71.3	\$375	\$26,737.50
Gonzalez, J.	(PL)	-	-	-	-	22.70	-	-	-	-	-	-	-	-	-	22.7	\$375	\$8,512.50

Categories:

(1) Investigation

(2) Pleadings

(3) Discovery Produced by Defendants

(4) Discovery Produced by Plaintiffs

(5) Motions & Legal Research

(6) Court Appearances

(7) Expert Discovery (incl. consultants)

(8) Mediation

(9) Settlement

(10) Class Certification

(11) Trial Prep & Trial

(12) Appeal

(13) Litigation Strategy & Analysis

(14) Case Management

Name	Position	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total Hours	Current Rate	Lodestar
McLaughlin, E.	(PL)	0.50	-	12.10	16.50	4.80	-	-	-	-	-	-	-	-	4.30	38.2	\$365	\$13,943.00
Richardson, A.	(PL)	-	34.70	-	-	11.30	-	-	-	-	-	-	-	-	-	46.0	\$225	\$10,350.00
TOTALS:		583.60	325.40	4,238.20	500.90	2,661.40	147.30	1,147.20	813.00	169.40	309.80	5,122.50	65.30	829.40	335.40	17,248.8		\$12,548,861.00

v

DECLARATION OF CAROL C. VILLEGAS IN SUPPORT OF CLASS COUNSEL'S MOTION FOR
ATTORNEYS' FEES AND EXPENSES AND PLAINTIFFS' APPLICATION FOR SERVICE AWARDS
CASE NO. 3:21-CV-00757-JD

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

EXHIBIT C

EXHIBIT C – Firm Expenses

Time Period: Inception through July 31, 2025

Expense Categories		Expenses
Outside Duplicating		\$684.49
In-House Duplicating/Printing		\$12,355.20
Witness/Service/Filing Fees		\$11,773.53
Court Reporting & Transcripts		\$1,119.14
Computer Research/Databases/Docket Fees		\$70,565.80
Long Distance Telephone/Conference Calling		\$213.10
Postage/Overnight Mail/Messenger		\$947.59
Expert/Consultant Fees		\$11,875.00
Consulting Expert – Marketing Data Value	\$6,000.00	
Consulting Expert – Privacy Disclosure Standards	\$1,500.00	
Consulting Expert – Women’s Health App Industry	\$4,375.00	
Mediation Fees		\$27,500.00
Travel (Air/Ground Transportation, Meals, Lodging)		\$88,264.57
Local Work-Related Transportation/Meals		\$10,580.00
Miscellaneous		\$380.40
TOTAL		\$236,258.82

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

EXHIBIT C-1

EXHIBIT C – 1 Joint Litigation Fund

Expense Categories		Expenses
Appeal Printer		\$7,743.19
Overnight Delivery Costs - Trial		\$9,506.03
Court Reporting - Trial		\$16,137.97
Court Filing, Service & Courtesy Copy Costs		\$6,311.13
Translation Services		\$11,700.00
Deposition Transcription & Videography		\$208,173.54
Consulting Experts		\$8,465.00
Women's Health Apps	\$7,437.50	
Marketing Analytics and Data Value	\$450.00	
Insurance	\$577.50	
Testifying Experts		\$764,118.05
David A. Hoffman (privacy disclosure standards/data valuation)	\$200,000.00	
Serge Egelman (mobile and web application analytics)	\$285,851.93	
Jennifer Golbeck (machine learning and algorithm design)	\$278,266.12	
Jury Focus Group Consultants		\$123,597.31
Mediation Fees		\$95,000.00
Litigation Support - Presentations/Demonstratives		\$2,625.00
Trial Exhibits		\$2,880.84
Hotel - Trial		\$196,253.93
Lodging	\$76,956.16	
War Room Rental	\$55,229.09	
Equipment	\$43,509.45	
Mailroom Rental	\$19,088.28	
Hotel Meals - Class Representatives	\$1,470.95	
TOTAL		\$1,452,511.99

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

EXHIBIT D

EXHIBIT D

Out-of-Town Travel - Airfare, Transportation, Meals, Lodging: \$88,264.57

NAME	DATE	END DATE	DESTINATION	PURPOSE
C. Villegas	2/8/2022	2/9/2022	San Francisco, CA	Cancelled Court Hearing (MTD)
C. Villegas	5/3/2022	5/6/2022	San Francisco, CA	Court Hearing
D. Mazzeo	5/4/2022	5/5/2022	San Francisco, CA	Court Hearing
C. Villegas	12/21/2022	12/22/2022	San Francisco, CA	Court Hearing (Discovery)
D. Saldamondo	12/21/2022	12/22/2022	San Francisco, CA	Court Hearing (Discovery)
D. Saldamondo	2/21/2024	2/22/2024	San Francisco, CA	Court Hearing (Class Certification/SJ)
C. Villegas	2/21/2024	2/23/2024	San Francisco, CA	Court Hearing (Class Certification/SJ)
D. Mazzeo	2/21/2024	2/23/2024	San Francisco, CA	Court Hearing (Class Certification/SJ)
D. Mazzeo	6/19/2024	6/20/2024	San Francisco, CA	Cancelled Court Hearing
C. Fox	9/9/2024	9/9/2024	College Park, MD	Meeting with Expert
D. Mazzeo	9/9/2024	9/9/2024	College Park, MD	Meeting with Expert
D. Mazzeo	9/10/2024		College Park, MD	Cancelled Deposition
D. Mazzeo	10/2/2024	10/3/2024	San Francisco, CA	Cancelled Court Hearing
C. Villegas	10/27/2024	10/28/2024	San Francisco, CA	Mediation
M. Canty	10/27/2024	10/28/2024	San Francisco, CA	Mediation
D. Mazzeo	10/27/2024	10/31/2024	San Francisco, CA	Mediation
J. Gardner	10/27/2024	10/29/2024	San Francisco, CA	Mediation
J. Bissell-Linsk	10/27/2024	10/28/2024	San Francisco, CA	Mediation
G. Medina	10/29/2024	10/31/2024	San Francisco, CA	Mediation
C. Villegas	11/6/2024	11/9/2024	San Francisco, CA	Mediation
J. Bissell-Linsk	11/6/2024	11/7/2024	San Francisco, CA	Mediation
D. Mazzeo	11/6/2024	11/7/2024	San Francisco, CA	Mediation
J. Bissell-Linsk	5/14/2025	5/15/2025	San Francisco, CA	Court Hearing
M. Canty	6/2/2025	6/3/2025	San Francisco, CA	Court Hearing
C. Villegas	6/2/2025	6/3/2025	San Francisco, CA	Court Hearing
J. Bissell-Linsk	6/24/2025	6/26/2025	San Francisco, CA	Court Hearing (Pretrial)
M. Canty	6/25/2025	6/28/2025	San Francisco, CA	Court Hearing (Pretrial)
C. Villegas	6/25/2025	6/27/2025	San Francisco, CA	Court Hearing (Pretrial)
G. Medina	6/25/2025	6/27/2025	San Francisco, CA	Court Hearing (Pretrial)
J. Bissell-Linsk	6/29/2025	6/30/2025	Columbus, OH	Client Meeting
G. Medina	7/13/2025	8/1/2025	San Francisco, CA	Trial
D. Saldamondo	7/13/2025	7/16/2025	San Francisco, CA	Trial
V. Vibar	7/13/2025	8/1/2025	San Francisco, CA	Trial
K. Judd	7/13/2025	8/1/2025	San Francisco, CA	Trial
C. Villegas	7/13/2025	8/2/2025	San Francisco, CA	Trial

NAME	DATE	END DATE	DESTINATION	PURPOSE
T. Hoffman	7/13/2025	8/1/2025	San Francisco, CA	Trial
J. Bissell-Linsk	7/14/2025	7/22/2025	San Francisco, CA	Trial
M. Canty	7/14/2025	8/1/2025	San Francisco, CA	Trial
D. Saldamondo	7/19/2025	7/24/2025	San Francisco, CA	Trial
T. Gamino	7/20/2025	7/24/2025	San Francisco, CA	Trial
J. Chen	7/20/2025	7/24/2025	San Francisco, CA	Trial
A. Meigs	7/20/2025	7/24/2025	San Francisco, CA	Trial
N. Donlon	7/27/2025	8/1/2025	San Francisco, CA	Trial
D. Saldamondo	7/28/2025	7/31/2025	San Francisco, CA	Trial
T. Gamino	7/30/2025	8/2/2025	San Francisco, CA	Trial
A. Meigs	7/30/2025	8/1/2025	San Francisco, CA	Trial

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

EXHIBIT E

EXHIBIT E

Court Reporting & Transcripts: \$1,119.14

<u>Date</u>	<u>Vendor</u>	<u>Purpose</u>
08/12/2021	Ana M. Dub CSR	Court Hearing
02/10/2022	Echo Court Reporting	CMC
05/05/2022	MK Litigation Solutions, Inc.	MTD Hearing
06/09/2022	Dipti Patel	CMC
08/26/2022	Pamela Batalo Hebel	Legal Research
09/15/2022	MK Litigation Solutions, Inc.	Legal Research
03/02/2023	Dipti Patel	Motion Hearing
04/20/2023	MK Litigation Solutions, Inc.	Legal Research
02/22/2024	Bryce Reporting Services, CSR PC	Class Certification and Summary Judgment Hearing
06/02/2025	Debra Pas	Status Conference
06/26/2025	Ruth Levine Ekhaus	Pretrial Conference
07/16/2025	Ruth Levine Ekhaus	Trial

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

EXHIBIT F

EXHIBIT F

Outside Duplicating: \$684.49

<u>Date</u>	<u>Vendor</u>	<u>Purpose</u>
01/12/2022	PM Legal	Canadian Court Filings
02/22/2024	FedEx Office	Class Certification Court Hearing
10/23/2024	Parcels, Inc.	Assistance with FTP site
06/27/2025	FedEx Office	Trial Preparation
07/21/2025	IStockPhoto	Trial

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

EXHIBIT G

EXHIBIT G

Witness, Service and Filing Fees: \$11,773.53

<u>Date</u>	<u>Vendor</u>	<u>Purpose</u>
2/2/2021	United States District Court Northern District of California	<i>Pro Hac Vice</i> - Ross Kamhi
2/2/2021	United States District Court Northern District of California	<i>Pro Hac Vice</i> - Michael Canty
2/2/2021	United States District Court Northern District of California	<i>Pro Hac Vice</i> - Melissa Nafash
2/2/2021	United States District Court Northern District of California	<i>Pro Hac Vice</i> - Jonathan Gardner
2/2/2021	United States District Court Northern District of California	<i>Pro Hac Vice</i> - Carol Villegas
2/10/2021	Court Support Inc.	Summons
3/18/2021	Court Support Inc.	Summons
6/23/2021	PM Legal	Affidavit of Service
7/14/2021	PM Legal	Motion to Relate
9/2/2021	United States District Court Northern District of California	<i>Pro Hac Vice</i> - David Saldamando
9/19/2022	United States District Court Northern District of California	<i>Pro Hac Vice</i> - Danielle Izzo
1/23/2023	United States District Court Northern District of California	<i>Pro Hac Vice</i> - Jake Bissell-Linsk
2/9/2023	PM Legal	Subpoena
2/22/2023	PM Legal	Subpoena
3/30/2023	PM Legal	Subpoena
7/10/2024	United States District Court Northern District of California	<i>Pro Hac Vice</i> - Gloria Medina
9/3/2024	ACE Attorney Service	Courtesy Copy of Class Certification Brief
2/25/2025	United States District Court Northern District of California	<i>Pro Hac Vice</i> - Michael Hotz
3/7/2025	ACE Attorney Service	Subpoena
6/18/2025	United States District Court Northern District of California	<i>Pro Hac Vice</i> - Thomas Hoffman

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@scc.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, INC.,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF DIANA J. ZINSER
ON BEHALF OF SPECTOR CALDES
& CORRIGAN, P.C. IN SUPPORT OF
CLASS COUNSEL'S MOTION FOR
AWARD OF ATTORNEYS' FEES AND
EXPENSES, AND PLAINTIFFS'
APPLICATION FOR SERVICE
AWARDS**

1 I, Diana J. Zinser, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am an attorney duly licensed to practice in Pennsylvania and am admitted *pro hac*
3 *vice* before this Court. I am a partner with the law firm Spector Caldes & Corrigan, P.C., (“SCC”) and counsel of record for Plaintiff Justine Pietrzyk in the above-captioned action (the “Action”). I
4 submit this declaration in support of Class Counsel’s Motion for Award of Attorneys’ Fees and
5 Expense and Plaintiffs’ Application for Service Awards (“Fee and Expense Application”) filed
6 concurrently herewith.

7
8 2. The statements herein are true to the best of my personal knowledge, information,
9 and belief based on the books and records of SCC and information received from SCC attorneys
10 and staff.

11 3. Unless otherwise defined, capitalized terms herein have the same meaning as in the
12 Settlement Agreements between Plaintiffs and Flurry LLC (“Flurry”), Google LLC (“Google”),
13 and Flo Health, Inc. (“Flo”). *See* ECF Nos. 589-2, 820-2, 820-3.

14 4. I have been appointed as Co-Class Counsel for the Plaintiffs and the Class in this
15 matter together with Christian Levis of Lowey Dannenberg, P.C. (“Lowey”) and Carol Villegas of
16 Labaton Keller Sucharow LLP (“Labaton”) (collectively referred to as “Class Counsel”).

17 5. The schedules attached as Exhibit A and B summarize the hours and lodestar of
18 SCC from inception of this Action through July 31, 2025 (when the trial in this Action concluded)
19 and include a breakdown of the hours by category of work. The total hours were determined by
20 the examination of contemporaneous, daily time records regularly prepared and maintained by my
21 firm. Lodestar calculations for the time incurred are based on the firm’s standard current hourly
22 rates and were prepared based upon daily time records maintained by attorneys and professional
23 support staff at the firm. The lodestar figures do not include costs related to expense items. SCC
24 time records have been reviewed to confirm both the accuracy of the entries as well as the necessity
25 for and reasonableness of the time expended in this litigation. As a result of this review, certain
26 reductions were made to time and lodestar either in the exercise of billing judgment or to conform
27 with the requirements of this matter. Time spent by attorneys and staff who worked fewer than 10

hours on the case has been omitted from the lodestar calculation. Further, per the Court's Order re Co-Lead Counsel (ECF No. 80), barring unusual circumstances, the time of no more than two lawyers from the firm for attendance at most fact depositions has been included, and general read/review time for most attorneys has been omitted; only the attorneys designated by Class Counsel to review or summarize pleadings, orders and communications are included in the hours and lodestar calculations.

6. The time set forth in this Declaration does not include any work performed after the conclusion of the jury trial in the Action on or around July 31, 2025. To the extent there is a fee and expense application submitted in connection with the judgment entered for the jury verdict in this Action achieved against Meta Platforms, Inc. ("Meta"), such application will report the total hours invested in this Action, including all work performed after July 31, 2025.

7. The hourly rates for the attorneys and other professional support staff at my firm are the same as the usual and customary hourly rates used for their services in contingent matters and have been approved by other courts in similar matters. *See, e.g., In re Xyrem (Sodium Oxybate) Antitrust Litig.*, No. 3:20-md-02966-RS, ECF No. 1067 (N.D. Cal. Oct. 27, 2025); *Braun et al. v. The Philadelphia Inquirer, LLC*, No. 2:22-cv-04185-JMY, ECF No. 74 (E.D. Pa. May 6, 2025); *Le et al. v. Zuffa LLC*, No. 2:15-cv-01045, ECF No. 1065 (D. Nev. Mar. 3, 2025); *In re Effexor ER Antitrust Litig.*, No. 3:11-cv-05479, ECF No. 761 (D.N.J. Sept. 12, 2024). For personnel no longer employed by SCC, the lodestar calculation is based on the hourly rates for such personnel in his or her final year of employment. The work performed by contract attorneys not employed by SCC is included in SCC's lodestar at hourly rates comparable to those approved by courts in other cases within this District. *See, e.g., In re Meta AI Glasses Litig.*, No. 3:26-cv-01897-EMC, 2026 WL 2178974 (N.D. Cal. July 28, 2026); *In re JUUL Labs, Inc. Mktg., Sales Practices, and Prods. Liab. Litig.*, No. 19-md-02913-WHO, 2023 WL 11820531 (N.D. Cal. Dec. 18, 2023); *In re MacBook Keyboard Litig.*, No. 5:18-cv-02813-EJD, 2023 WL 3688452 (N.D. Cal. May 25, 2023); *Optronic Techs., Inc. v. Ningbo Sunny Elec. Co., Ltd.*, 612 F. Supp.3d 899 (N.D. Cal. 2020).

8. The SCC personnel that performed services on behalf of the Class include, but are

not limited to, the following:

- a. **Diana Zinser** (Partner): Co-Lead Counsel; oversaw SCC team. Attended and participated in case management meetings internally and with Co-Lead Counsel; attended court hearings; managed communications with client including responding to defendants' discovery requests; met and conferred with defendants' on discovery requests and disputes; managed subpoenas to third parties; prepared for, took, and defended fact and expert witness depositions; oversaw document review assignments and analyzed resulting work product and underlying documents; reviewed and edited draft class certification motions and opposition to summary judgment motions; engaged in court-ordered mediation; served as member of trial team.
- b. **Jeffrey Kodroff** (Partner): Attended and participated in case management meetings; discussed and set case strategy; analyzed documents produced by defendants; reviewed and edited draft Daubert motions; engaged in court-ordered mediation; assisted in trial preparation.
- c. **Icee Etheridge** (Associate): Met and conferred with defendants' on discovery requests and disputes; reviewed documents produced by defendants at the direction of Co-Lead Counsel; performed legal research; reviewed and edited draft class certification motions and opposition to summary judgment motions; reviewed and edited draft Daubert motions.
- d. **Cary Zhang** (Associate): Met and conferred with defendants' on discovery requests and disputes; reviewed documents produced by defendants at the direction of Co-Lead Counsel; performed legal research; reviewed and edited draft class certification motions and opposition to summary judgment motions; reviewed and edited draft Daubert motions.
- e. **Alicia Sandoval** (Associate): Performed legal research; reviewed and edited draft motions; prepared for and assisted trial team throughout trial.

1 f. **Mary Ann Geppert** (Of Counsel): Performed legal research; assisted in drafting
2 and revising motions.

3 g. **Edgar Pevsner** (Contract Attorney): At the direction of Co-Lead Counsel,
4 translated and reviewed Russian language documents produced by defendants.

5 h. **Gerri DeMarshall** (Senior Paralegal): Prepared correspondence and court filings;
6 organized case files; assisted trial team throughout trial.

7 9. The total time for which my firm is requesting an award of legal fees is 10,402.50
8 hours. The total lodestar value of these professional services is \$7,290,387.00.

9 10. Attached as Exhibit C is a schedule of SCC's expenses reasonably incurred in
10 connection with this Action for which reimbursement is requested. Expense items are recorded
11 separately from time, and are not duplicated in the firm's current hourly rates. Further, expense
12 items do not contain any general overhead costs, and do not contain a surcharge over the amount
13 incurred.

14 11. As detailed and categorized in the schedule attached as Exhibit C, SCC incurred a
15 total of \$79,895.75 in expenses from inception through July 31, 2025. The schedule is based upon
16 expense records recorded in SCC's books and records. These books and records are prepared from
17 expense vouchers, check records, receipts, and other source materials.

18 12. The following is additional information regarding certain of these expenses:

19 a. Work-Related Airfare, Lodging, Meals, Transportation: \$36,763.94. In connection
20 with the prosecution of the Action, SCC incurred \$193.92 in connection with local transportation
21 and meal costs directly attributable to work on the case. In addition, SCC paid a total of \$36,570.02
22 for out-of-town travel expenses related to, among other things, attending court hearings, case-
23 related meetings, trial, and mediations. Consistent with this Court's Order re Co-Lead Counsel
24 (ECF No. 80), all flight costs for domestic air travel of less than six hours are at coach class fares
25 regardless of the class flown, with only travel exceeding six hours of flight time eligible to be at
26 business class fares. Per diem expenses on travel days were limited to \$125 per person, exclusive
27 of lodging and transportation. A listing of the out-of-town travel trips is set forth in Exhibit D.

b. Computer Research, Databases & Docket Fees: \$26,737.47. These costs reflect expenses attributable to the use of Westlaw, Lexis, and PACER in connection with the Action.

c. Court Transcripts/Court Reporter Fees: SCC paid \$323.40 to court reporter Ana Dub for court hearing transcripts.

d. Expert/Consultant Fees: \$10,110.75. In addition to the costs incurred by the litigation fund established in this case (see below), SCC also paid University Language Services for certified translations of Russian language documents produced by Defendants in the Action.

e. In-House and Outside Duplicating: \$2,190.19. In connection with this case, SCC made 6,259 black and white copies at \$0.25/page for a total of \$1,564.75. For in-house duplicating, our system required that a case/client-matter code be entered to track the number of pages copied/printed for the case. In addition, SCC paid a total of \$625.44 to outside vendors Reliable (\$378.95) and Ace Attorney Services (\$246.49) to produce copies and other visuals.

f. Service and Filing Fees: \$3,633.80. SCC paid \$1,689.20 to outside vendor Best Legal Services for the service of third party subpoenas, and \$1,944.60 in court filing fees for *pro hac vice* applications and associated certificates of good standing.

g. Mail: \$136.20. SCC paid \$86.20 in USPS postage and Federal Express costs, and \$50.00 in wire fees.

13. In addition, SCC contributed to the litigation fund established by Class Counsel for the payment of certain expenses of the Action, including expenses related to experts and preparation for trial. Labaton will report the expenses incurred by the litigation fund.

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

Executed this 20th day of August, 2026, at Berwyn, Pennsylvania.


/s/ Diana J. Zinser

EXHIBIT A
Spector Caldes Corrigan – Lodestar by Timekeeper
Time Period: Inception through July 31, 2025

Attorneys	Role	Total Hours	Hourly Rate	Total Lodestar
Diana Zinser	P	3763.10	\$900.00	\$3,386,790.00
Jeffrey Kodroff	P	526.70	1,075.00	566,202.50
Jeffrey Spector	P	105.50	1,010.00	106,555.00
John Macoretta	P	298.10	995.00	296,609.50
William Caldes	P	134.70	1,150.00	154,905.00
Jeffrey Corrigan	P	78.70	1,150.00	90,505.00
Icee Etheridge	A	988.20	650.00	642,330.00
Cary Zhang	A	1087.50	550.00	598,125.00
Alicia Sandoval	A	458.50	710.00	325,535.00
Rachel Kopp	OC	18.00	760.00	13,680.00
MaryAnn Geppert	OC	144.70	760.00	109,972.00
Edgar Pevsner	CA	320.50	350.00	112,175.00
Alan Sacks	CA	616.00	350.00	215,600.00
Sang Kim	CA	669.00	350.00	234,150.00
Jun Ge	CA	520.00	350.00	182,000.00
TOTAL:		9,729.20		\$7,035,134.00

Non-Attorneys	Role	Total Hours	Hourly Rate	Total Lodestar
Gerri DeMarshall	SPL	542.50	400.00	\$217,000.00
Alex Iozzo	PL	102.60	300.00	30,780.00
Florence Bristow	PL	28.20	265.00	7,473.00
TOTAL:		673.30		\$255,253.00
GRAND TOTAL:		10,402.50		\$7,290,387.00

Title Key:

(P) Partner	(OC) Of Counsel	(PL) Paralegal
(A) Associate	(SA) Staff Attorney	
(CA) Contract Attorney	(LC) Law Clerk	
(I) Investigator	(SPL) Senior Paralegal	

Exhibit B
Spector Caldes & Corrigan - Time by Category
Time Period: Inception through July 31, 2025

Categories:

- | | | |
|--------------------------------------|--|-------------------------------------|
| (1) Investigation | (6) Court Appearances | (11) Trial Prep & Trial |
| (2) Pleadings | (7) Expert Discovery (incl. consultants) | (12) Appeal |
| (3) Discovery Produced by Defendants | (8) Mediation | (13) Litigation Strategy & Analysis |
| (4) Discovery Produced by Plaintiffs | (9) Settlement | (14) Case Management |
| (5) Motions & Legal Research | (10) Class Certification | |

Name	Position	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total Hours	Current Rate	Lodestar
Diana Zinser	P	29.30	122.20	800.80	140.30	416.30	121.90	588.50	212.10	80.60	334.10	227.60	11.60	676.00	1.80	3,763.10	\$ 900.00	\$ 3,386,790.00
Jeffrey Kodroff	P	8.80	-	78.70	1.00	56.10	9.50	78.50	47.50	10.50	17.10	95.10	11.00	112.90	-	526.70	\$ 1,075.00	\$ 566,202.50
Jeffrey Spector	P	1.30	1.90	2.00	-	2.70	0.80	1.50	13.20	10.00	4.30	23.80	0.80	43.20	-	105.50	\$ 1,010.00	\$ 106,555.00
John Macoretta	P	15.80	15.80	4.80	8.00	15.00	-	115.60	61.70	2.70	11.10	-	-	46.60	1.00	298.10	\$ 995.00	\$ 296,609.50
William Caldes	P	-	2.50	11.30	-	6.50	-	2.70	28.40	24.20	8.00	13.00	5.40	32.70	-	134.70	\$ 1,150.00	\$ 154,905.00
Jeffrey Corrigan	P	-	1.40	0.20	-	2.90	2.90	-	17.40	10.90	3.20	17.70	-	22.10	-	78.70	\$ 1,150.00	\$ 90,505.00
Icee Etheridge	A	3.40	3.90	414.90	-	69.80	0.70	38.90	51.30	9.70	74.40	34.60	7.70	278.90	-	988.20	\$ 650.00	\$ 642,330.00
Cary Zhang	A	-	-	262.10	8.50	174.90	-	213.90	112.10	6.50	95.60	-	-	213.90	-	1,087.50	\$ 550.00	\$ 598,125.00
Alicia Sandoval	A	-	-	10.00	-	0.30	18.00	131.70	-	-	2.70	280.50	-	15.30	-	458.50	\$ 710.00	\$ 325,535.00
Rachel Kopp	OC	-	-	18.00	-	-	-	-	-	-	-	-	-	-	-	18.00	\$ 760.00	\$ 13,680.00
Mary Ann Geppert	OC	-	-	8.90	-	-	-	103.00	-	32.80	-	-	-	-	-	144.70	\$ 760.00	\$ 109,972.00
Edgar Pevsner	CA	-	-	320.50	-	-	-	-	-	-	-	-	-	-	-	320.50	\$ 350.00	\$ 112,175.00
Alan Sacks	CA	-	-	616.00	-	-	-	-	-	-	-	-	-	-	-	616.00	\$ 350.00	\$ 215,600.00
Sang Kim	CA	-	-	669.00	-	-	-	-	-	-	-	-	-	-	-	669.00	\$ 350.00	\$ 234,150.00
Jun Ge	CA	-	-	520.00	-	-	-	-	-	-	-	-	-	-	-	520.00	\$ 350.00	\$ 182,000.00
Gerri DeMarshall	PL	2.40	15.10	161.20	0.80	30.00	-	7.30	19.10	-	46.40	246.40	-	0.30	13.50	542.50	\$ 400.00	\$ 217,000.00
Alex Iozzo	PL	-	-	51.40	-	1.00	-	22.00	17.00	7.20	-	-	1.00	3.00	-	102.60	\$ 300.00	\$ 30,780.00
Florence Bristow	PL	-	3.70	13.40	-	3.30	-	4.60	1.50	-	-	-	-	-	1.70	28.20	\$ 265.00	\$ 7,473.00
TOTALS:		61.00	166.50	3,963.20	158.60	778.80	153.80	1,308.20	581.30	195.10	596.90	938.70	37.50	1,444.90	18.00	10,402.50		\$ 7,290,387.00

(P) Partner (I) Investigator
(OC) Of Counsel (PL) Paralegal
(SA) Staff Attorney (CA) Contract Attorney

DECLARATION OF DIANA J. ZINSER ON BEHALF OF SPECTOR CALDES & CORRIGAN, P.C. IN SUPPORT
OF CLASS COUNSEL'S MOTION FOR ATTORNEYS' FEES AND EXPENSE AWARDS AND PLAINTIFFS'
APPLICATION FOR SERVICE AWARDS
CASE NO. 3:21-CV-00757-JD

EXHIBIT C**Spector Caldes & Corrigan Firm Expenses**

Time Period: Inception through July 31, 2025

Expense Categories	Expenses
Outside Duplicating	625.44
In-House Duplicating/Printing	1,564.75
Witness/Service/Filing/Misc. Court Fees	3,633.80
Court & Deposition Reporting/Transcripts	323.40
Computer Research/Databases/Docket Fees	\$26,737.47
Postage/Overnight Mail/Messenger	\$136.20
Expert/Consultant Fees	\$10,110.75
Travel (air/ground transportation, meals, hotel)	\$36,570.02
Local Work-Related Transportation/Meals	\$193.92
TOTAL	\$79,895.75

EXHIBIT D
Spector Caldes & Corrigan – Out of Town Travel

Out of Town Travel - Airfare, Lodging, Meals, Taxi: \$36,570.02

Name	Date	Destination and Purpose
Diana Zinser	2/11/2022	San Francisco – motion to dismiss hearing (cancelled; continued to 4/14/2022)
Diana Zinser	12/21/2022 – 12/22/2022	San Francisco – hearing on discovery disputes
Icee Etheridge	2/22/2022	San Francisco – hearing on Dauberts (cancelled; mooted by Court’s 2/1/2024 order)
Diana Zinser	2/21/2024 – 2/22/2024	San Francisco – hearing on plaintiffs’ motion for class certification and Google’s motion for summary judgment
John Macoretta	6/4/2024	New York – Meta mediation (cancelled)
Diana Zinser	10/3/2024	San Francisco – status conference (vacated by Court’s 9/30/2024 order)
Diana Zinser	10/27/2024 – 10/29/2024	San Francisco – Court-ordered mediations with Flo, Flurry, Meta before Ambassador Bleich
Jeffrey Kodroff	10/27/2024 – 10/28/2024	San Francisco – Court-ordered mediations with Flo, Flurry, Meta before Ambassador Bleich
Cary Zhang	11/6/2024 – 11/8/2024	San Francisco – Court-ordered mediation with Google before Ambassador Bleich
Diana Zinser	5/14/2025 – 5/16/2025	San Francisco – hearing on preliminary approval of Flurry settlement and on Daubert motions
Alicia Sandoval	5/27/2025	New York – Co-lead trial strategy meeting
Diana Zinser	5/27/2026	New York – Co-lead trial strategy meeting
Diana Zinser	6/1/2025 – 6/3/2025	San Francisco – Status conference on class notice
Diana Zinser	6/25/2025 – 6/26/2025	San Francisco – final pre-trial conference
Diana Zinser	7/14/2025 – 8/1/2025	San Francisco – trial
Alicia Sandoval	7/14/2025 – 8/1/2025	San Francisco – trial
Gerri DeMarshall	7/14/2025 – 8/1/2025	San Francisco – trial
Jeffrey Spector	7/20/2025 – 7/22/2025	San Francisco – trial

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@scc.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, INC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF KAS L.
GALLUCCI IN SUPPORT OF CLASS
COUNSEL'S MOTION FOR AWARD
OF ATTORNEYS' FEES AND
EXPENSES, AND PLAINTIFFS'
APPLICATION FOR SERVICE
AWARDS**

1 I, Kas L. Gallucci, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am an attorney duly licensed to practice before all District Courts in California, the
3 Ninth Circuit and various other District Courts through the County. I am a Senior Associate with
4 the law firm Marron PC and counsel of record for Plaintiff(s) Tesha Gamino and Jennifer Chen in
5 the above-captioned action (the “Action”). I submit this declaration in support of Class Counsel’s
6 Motion for Award of Attorneys’ Fees and Expenses and Plaintiffs’ Application for Service Awards
7 (“Fee and Expense Application”) filed concurrently herewith.

8 2. The statements herein are true to the best of my personal knowledge, information,
9 and belief based on the books and records of Marron PC and information received from Marron PC
10 attorneys and staff.

11 3. Unless otherwise defined, capitalized terms herein have the same meaning as in the
12 Settlement Agreements between Plaintiffs and Flurry LLC (“Flurry”), Google LLC (“Google”),
13 and Flo Health, Inc. (“Flo”). *See* ECF Nos. 589-2, 820-2, 820-3.

14 4. At the direction of the Court-appointed Co-Class Counsel for the Plaintiffs and the
15 Class, Christian Levis of Lowey Dannenberg, P.C. (“Lowey”), Carol Villegas of Labaton Keller
16 Sucharow LLP (“Labaton”) and Diana J. Zinser of Spector Caldes & Corrigan, PC (“SCC”),
17 (collectively referred to as “Class Counsel”), my firm has contributed time and resources to the
18 prosecution of the Action resulting in the achievement of the Settlements before the Court.

19 5. The schedules attached as Exhibit A and B summarize the hours and lodestar of
20 Marron PC from inception of this Action through July 31, 2025 (when the trial in this Action
21 concluded) and include a breakdown of the hours by category of work. The total hours were
22 determined by the examination of contemporaneous, daily time records regularly prepared and
23 maintained by my firm. Lodestar calculations for the time incurred are based on the firm’s standard
24 current hourly rates and were prepared based upon daily time records maintained by attorneys and
25 professional support staff at the firm. The lodestar figures do not include costs related to expense
26 items. Marron PC time records have been reviewed to confirm both the accuracy of the entries as
27 well as the necessity for and reasonableness of the time expended in this litigation. As a result of

1 this review, certain reductions were made to time and lodestar either in the exercise of billing
 2 judgment or to conform with the requirements of this matter. Time spent by attorneys and staff who
 3 worked fewer than 10 hours on the case has been omitted from the lodestar calculation. Further, per
 4 the Court's Order re Co-Lead Counsel (ECF No. 80), barring unusual circumstances, the time of
 5 no more than two lawyers from the firm for attendance at most fact depositions has been included,
 6 and general read/review time for most attorneys has been omitted; only the attorneys designated by
 7 Class Counsel to review or summarize pleadings, orders and communications are included in the
 8 hours and lodestar calculations.

9 6. The time set forth in this Declaration does not include any work performed after the
 10 conclusion of the jury trial in the Action on or around July 31, 2025. To the extent there is a fee and
 11 expense application submitted in connection with the judgment entered for the jury verdict in this
 12 Action achieved against Meta Platforms, Inc. ("Meta"), such application will report the total hours
 13 invested in this Action, including all work performed after July 31, 2025.

14 7. The hourly rates for the attorneys and other professional support staff at my firm are
 15 the same as the usual and customary hourly rates used for their services in contingent matters and
 16 have been approved by other courts in similar matters. California courts have repeatedly held rates
 17 commensurate with our rates to be fair and reasonable. *See, e.g., Zhang v. Ehang Holdings Ltd.*,
 18 No. 2:23-CV-10165-MWC (DFMX), 2026 WL 516241, at *14 (C.D. Cal. Jan. 12, 2026) (finding
 19 "applied hourly rates of \$1100–1400 for partners, \$975 for counsel, \$500–675 for associates, and
 20 \$250 for paralegals" to be "in line with prevailing rates in this district" for complex class action
 21 litigators in Los Angeles); *In re ZF-TRW Airbag Control Units Prods. Liab. Litig.*, No. 2:-19-ML-
 22 2906-JAK (JPRX), 2025 WL 4231615, at *20 (C.D. Cal. Oct. 8, 2025) (noting that in 2023, hourly
 23 rates litigators in Los Angeles ranged \$525–\$1,159 per hour for partners and \$431–\$880 for
 24 associates); *In re Animation Workers Antitrust Litig.*, No. 14-CV04062, 2016 WL 6663005, at *6
 25 (N.D. Cal. Nov. 11, 2016) (finding \$1,200 per hour to be reasonable for senior attorneys); *Nitsch v.*
 26 *DreamWorks Animation SKG Inc.*, No. 14-CV04062, 2017 WL 2423161, at *9 (N.D. Cal. June 5,
 27 2017) (finding \$1,200 per hour to be reasonable for senior attorneys); *In re Anthem, Inc. Data*

Breach Litig., No. 15-MD-0261-JHK, 2018 WL 3960068, at *17 (N.D. Cal. Aug. 17, 2018) (approving billing rates for partners between \$400 and \$970, and associates between \$185 to \$850). The rates that Marron PC has charged are reflective of its expertise and the preeminent success Marron PC has achieved in class action litigation across the country. Courts have also recognized that my law firm's attorney's hourly rates are reasonable. For example:

a) On November 14, 2025, the Marron Firm's hourly rates of \$845 for Ronald A. Marron, \$650 for Alexis M. Wood, \$625 for Kas L. Gallucci were approved in the matter of *Murphy v. Kochava, Inc.*, No. 2:23-cv-00058-BLM in the District of Idaho before the Honorable B. Lynn Winmill.

b) On May 17, 2024, the Marron Firm's hourly rates of \$845 for Ronald A. Marron, \$605 for Kas L. Gallucci, \$570 for Michael Houchin, and \$515 for Lilach Halperin were approved in the matter of *Marin v. Cheeky Scientist, LLC, et al.*, Case No. 37-2022-00043918-CU-CO-CTL in the San Diego Superior Court before the Honorable Carolyn Caietti.

c) On November 21, 2023, the Marron Firm's hourly rate of \$605 for Kas Gallucci was approved in the matter of *In Re UKG Cybersecurity Litigation*, Case No. 3:22-cv-00346-SI in the Southern District of California before the Honorable Judge Susan Illston.

d) On August 2, 2023, the Marron Firm's hourly rates of \$815 for Ronald A. Marron, \$570 for Michael Houchin, and \$500 for Lilach Halperin were approved in the matter of *Mirzoyan et al. v. The Hershey Company*, Case No. CGC-20-583659 in the Superior Court of California for the County of San Francisco before the Honorable Samuel K. Feng presiding.

e) On July 21, 2023, the Marron Firm's hourly rates of \$845 for Ronald A. Marron, \$605 for Kas Gallucci, \$570 for Michael Houchin, and \$500 for Lilach Halperin were approved in the matter of *Robbins et al v. Plushcare, Inc. et al*, Case No. 3:21-cv-03444-MMC in the Northern District of California before the Honorable Maxine M. Chesney.

For personnel no longer employed by Marron PC, the lodestar calculation is based on the hourly

1 rates for such personnel in his or her final year of employment

2 8. The services Marron PC performed on behalf of the Class include, but are not
3 limited, the following:

4 My colleague Alexis Wood as well as myself are the lead attorneys on this Action at my
5 firm. At the direction of the Court-appointed Co-Class Counsel for the Plaintiffs and the
6 Class my firm contributed time and resources to the prosecution of the Action. Such task
7 include, among others, (1) engaged in extensive pre-suit investigation prior to consolidating
8 our firm's actions into this current Action; (2) prepared and filed two separate cases prior
9 to consolidation; (3) assisted in the review and drafting of numerous motions filed in this
10 Action, including oppositions to motions to dismiss, class certification briefing, opposing
11 summary judgements filed on by all Defendants, and numerous discovery motions; (4)
12 assisted in discovery meet and confers and related letters pertaining to pressing for
13 responsive documents and evidence; (5) took lead to assist Plaintiffs Tesha Gamino and
14 Jennifer Chen in all discovery and deposition preparation and acted as a liaison to these
15 Plaintiffs throughout the Action; (6) reviewed and discussed with Plaintiffs Tesha Gamino
16 and Jennifer Chen all discovery served by Defendants regarding Ms. Gamino's and Ms.
17 Chen's data included in Defendants voluminous discovery productions; (7) prepared for and
18 defended the depositions of Tesha Gamino and Jennifer Chen; (8) participated in several
19 mediation sessions, Court-ordered and private; (9) took part in assisting Plaintiffs Tesha
20 Gamino and Jennifer Chen with trial preparation and attendance as witnesses; and (10) aided
21 in expert related work, including retention, review of documents and materials, deposition
22 preparation, depositions, and *Daubert* motions.

23 9. The total time for which my firm is requesting an award of legal fees is 1,292.2
24 hours. The total lodestar value of these professional services is \$1,008,310.50.

25 10. Attached as Exhibit C is a schedule of Marron PC's expenses reasonably incurred
26 in connection with this Action for which reimbursement is requested. Expense items are recorded
27 separately from time, and are not duplicated in the firm's current hourly rates. Further, expense

1 items do not contain any general overhead costs, and do not contain a surcharge over the amount
2 incurred.

3 11. As detailed and categorized in the schedule attached as Exhibit C, Marron PC
4 incurred a total of \$8,401.33 in expenses from inception through July 31, 2025. The schedule is
5 based upon expense records recorded in Marron PC's books and records. These books and records
6 are prepared from expense vouchers, check records, receipts, and other source materials.

7 12. The following is additional information regarding certain of these expenses:

8 a. Court Transcripts/Court Reporter Fees: \$2,930.21. The vendors paid to provide
9 court reporting and transcript services are listed in Exhibit D.

10 b. Witness, Service and Filing Fees: \$4,446.46. Marron PC paid costs related to
11 complaint filing fees; service of process; chamber copy fees. The vendors paid are set forth in
12 Exhibit E.

13 c. My firm also incurred \$690.00 in costs for Deadlines.com calendaring service.

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

15 Executed this 20th day of August, 2026, at San Diego, California.

16
17 /s/ Kas L. Gallucci

Kas L. Gallucci

EXHIBIT A – Lodestar by Timekeeper
Time Period: Inception through July 31, 2025

Attorneys	Role	Total Hours	Hourly Rate	Total Lodestar
Alexis Wood	Senior Associate Attorney	543.20	\$815.00	\$442,708.00
Kas Gallucci	Senior Associate Attorney	715.90	\$775.00	\$554,822.50
Elisa Pineda	Associate Attorney	12.20	\$500.00	\$6,100.00
SUBTOTAL:		1,271.30		\$1,003,630.50

Non-Attorneys	Role	Total Hours	Hourly Rate	Total Lodestar
Tiana Castro	Paralegal	20.80	\$225.00	\$4,680.00
SUBTOTAL:		20.80		\$4,680.00
GRAND TOTAL		1,292.10		\$1,008,310.50

Key:

EXHIBIT B – Hours by Category

Time Period: Inception through July 31, 2025

Categories:

- | | | |
|--------------------------------------|--|-------------------------------------|
| (1) Investigation | (6) Court Appearances | (11) Trial Prep & Trial |
| (2) Pleadings | (7) Expert Discovery (incl. consultants) | (12) Appeal |
| (3) Discovery Produced by Defendants | (8) Mediation | (13) Litigation Strategy & Analysis |
| (4) Discovery Produced by Plaintiffs | (9) Settlement | (14) Case Management |
| (5) Motions & Legal Research | (10) Class Certification | |

Name	Position	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Total Hours	Current Rate	Lodestar
Alexis Wood	A	23.20	21.50	78.60	96.80	123.70	4.90	60.20	11.10	5.50	10.20	3.00	-	80.70	23.80	543.20	\$815.00	442,708.00
Kas Gallucci	A	25.90	20.40	56.00	205.00	104.50	5.10	88.90	46.40	0.50	15.30	26.30	-	94.40	27.20	715.90	\$775.00	554,822.50
Elisa Pineda	A	-	1.00	9.00	-	2.20	-	-	-	-	-	-	-	-	-	12.20	\$500.00	6,100.00
Tiana Castro	PL	0.30	1.80	0.10	9.00	0.60	-	-	-	-	-	-	-	-	9.00	20.80	\$225.00	4,680.00
		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-
TOTALS:		49.40	44.70	143.70	310.80	231.00	10.00	149.10	57.50	6.00	25.50	29.30	-	175.10	60.00	1,292.10		1,008,310.50

(P) Partner	(I) Investigator
(OC) Of Counsel	(PL) Paralegal
(A) Associate	(RA) Research Analyst
(SA) Staff Attorney	(CA) Contract Attorney

EXHIBIT C – Firm Expenses

Time Period: Inception through July 31, 2025

Expense Categories	Expenses
Witness/Service/Filing Fees	\$4,446.46
Court & Deposition Reporting/Transcripts	\$2,930.21
Computer Research/Databases/Docket Fees	Waived
Long Distance Telephone/Conference Calling	Waived
Travel (air/ground transportation, meals, hotel)	\$334.66
Miscellaneous	\$690.00
TOTAL	\$8,401.33

EXHIBIT D

Court Transcripts/Court Reporter Fees: \$2,930.21

<u>Date</u>	<u>Vendor</u>	<u>Purpose</u>
12/8/2022	Veritex	Room rental fee for Tasha Gamino Deposition
4/11/2023	Veritex	Deposition Transcript of Jennifer Chen

EXHIBIT E

Witness, Service and Filing Fees: \$4,446.46

<u>Date</u>	<u>Vendor</u>	<u>Purpose</u>
2/2/21	Filing Fee	Gamino v. Flo Complaint
2/5/21	Brandywine Process Server	Service of Process Gamino Complaint
3/2/21	Filing Fee	Chen v. Flo Complaint
3/4/21	GSO Fee	Chamber copies of Chen Complaint
3/4/21	We Serve Law	Service of Process of Chen
3/11/21	We Serve Law	Service of Process of Chen (second attempt)
11/15/21	ACE Attorney Services	Chamber copies of Dkt. 100 and 100-1
8/31/22	ACE Attorney Services	Service of Subpoena on Buy Buy Baby
8/31/22	ACE Attorney Services	Service of Subpoena on Proctor and Gamble
1/19/24	ACE Legal	Chamber's copies
2/16/24	ACE Legal	Chamber's copies
7/1/24	ACE Legal	Chamber's copies
1/23/25	ACE Legal	Chamber's copies
2/24/25	ACE Legal	Chamber's copies
11/30/25	ACE Legal	Chamber's copies
12/31/25	ACE Legal	Chamber's copies

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@scc.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF WILLIAM D.
HARRIS II IN SUPPORT OF CLASS
COUNSEL'S MOTION FOR AWARD
OF ATTORNEYS' FEES AND
EXPENSES, AND PLAINTIFFS'
APPLICATION FOR SERVICE
AWARDS**

1 I, William D. Harris II, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as
2 follows:

3 1. I am an attorney duly licensed to practice before the courts of the New York and
4 the United States District Court for the Southern District of New York, and am admitted *pro hac*
5 *vice* before this Court. I am a Partner with the law firm Harris Legal Advisors LLC (“HLA”) and
6 counsel of record for Plaintiffs Autumn Meigs, and Leah Ridgway in the above-captioned action
7 (the “Action”). I submit this declaration in support of Class Counsel’s Motion for Award of
8 Attorneys’ Fees and Expenses and Plaintiffs’ Application for Service Awards (“Fee and Expense
9 Application”) filed concurrently herewith.

10 2. The statements herein are true to the best of my personal knowledge, information,
11 and belief based on the books and records of Harris Legal Advisors LLC.

12 3. Unless otherwise defined, capitalized terms herein have the same meaning as in the
13 Settlement Agreements between Plaintiffs and Flurry LLC (“Flurry”), Google LLC (“Google”),
14 and Flo Health, Inc. (“Flo”). *See* ECF Nos. 589-2, 820-2, 820-3.

15 4. At the direction of the Court-appointed Co-Class Counsel for the Plaintiffs and the
16 Class, Christian Levis of Lowey Dannenberg, P.C. (“Lowey”), Carol Villegas of Labaton Keller
17 Sucharow LLP (“Labaton”) and Diana J. Zinser of Spector Caldes & Corrigan, PC (“SCC”),
18 (collectively referred to as “Class Counsel”), my firm has contributed time and resources to the
19 prosecution of the Action resulting in the achievement of the Settlements before the Court.

20 5. For purposes of this Fee and Expense Declaration, the schedules attached as Exhibit
21 A and B summarize the hours and lodestar of Harris Legal Advisors LLC from inception of this
22 Action through July 31, 2025 (when the trial in this Action concluded) and include a breakdown
23 of the hours by category of work. The total hours were determined by the examination of
24 contemporaneous, daily time records regularly prepared and maintained by my firm. Lodestar
25 calculations for the time incurred are based on the firm’s standard current hourly rates and were
26 prepared based upon daily time records maintained by attorneys and professional support staff at
27

1 the firm. The lodestar figures do not include costs related to expense items. Harris Legal Advisors
2 LLC time records have been reviewed to confirm both the accuracy of the entries as well as the
3 necessity for and reasonableness of the time expended in this litigation. As a result of this review,
4 certain reductions were made to time and lodestar either in the exercise of “billing judgment” or
5 to conform with the requirements of this matter. Further, per the Court’s Order re Co-Lead Counsel
6 (ECF No. 80), barring unusual circumstances, the time of no more than two lawyers from the firm
7 for attendance at most fact depositions has been included, and general read/review time for most
8 attorneys has been omitted; only the attorneys designated by Class Counsel to review or summarize
9 pleadings, orders and communications are included in the hours and lodestar calculations.

10 6. The time set forth in this Declaration does not include any work performed after
11 the conclusion of the jury trial in the Action on or around July 31, 2025. To the extent there is a
12 fee and expense application submitted in connection with the judgment entered for the jury verdict
13 in this Action achieved against Meta Platforms, Inc. (“Meta”), such application will report the total
14 hours invested in this Action, including all work performed after July 31, 2025.

15 7. The hourly rates for the attorneys and other professional support staff at my firm
16 are the same as the usual and customary hourly rates used for their services in contingent matters
17 and have been approved by other courts in similar matters. *See Rasmussen, et al. v. Walt Disney*
18 *Company, et al.*, No. 19STCV10974 (L.A. Cal. Super. Ct. Dec. 5, 2025) (Mr. Harris’ hourly rate
19 of \$1,130.00 approved by the court). For personnel no longer employed by Harris Legal Advisors
20 LLC – Mr. Ryan Wageleitner - the lodestar calculation is based on the hourly rates for him in his
21 final year of employment.

22 8. The services Harris Legal Advisors LLC performed on behalf of the Class include,
23 but are not limited, the following:

24 9. Two (2) HLA timekeepers billed time to this Action: Ryan Wagenleitner and
25 myself. No paralegal or support-staff time is included in the firm's lodestar. I was personally
26 involved in every phase of this litigation, from client intake through verdict. That work included
27

1 affirmative and defensive written discovery and document review; expert discovery, including
2 depositions and *Daubert* briefing; and motion practice at each stage of the case, including the
3 motions to dismiss, class certification, summary judgment, and pretrial motions. I attended and
4 participated in every mediation session. At trial, I prepared witnesses for their testimony, supported
5 co-counsel on evidentiary issues and objections as they arose, prepared daily trial summary briefs,
6 and conducted legal research and briefing in anticipation of Defendants' post-trial motions.

7 Ryan Wagenleitner, then Of Counsel to the firm, worked under my supervision and was
8 assigned primarily to written discovery and legal research. Mr. Wagenleitner is no longer with the
9 firm.

10 10. The total time for which my firm is requesting an award of legal fees is 1,509.3
11 hours. The total lodestar value of these professional services is \$1,715,764.50.

12 11. Attached as Exhibit C is a schedule of Harris Legal Advisors LLC's expenses
13 reasonably incurred in connection with this Action for which reimbursement is requested. Expense
14 items are recorded separately from time and are not duplicated in the firm's current hourly rates.
15 Further, expense items do not contain any general overhead costs, and do not contain a surcharge
16 over the amount incurred.

17 12. As detailed and categorized in the schedule attached as Exhibit C, Harris Legal
18 Advisors LLC incurred a total of \$5,796.48 in expenses from inception through July 31, 2025. The
19 schedule is based upon expense records recorded in Harris Legal Advisors LLC's books and
20 records. These books and records are prepared from expense vouchers, check records, receipts,
21 and other source materials.

22 13. The following is additional information regarding certain of these expenses:

23 a. Work-Related Airfare, Lodging, Meals, Transportation: \$4,914.36. Each of these
24 expenditures were for out-of-town travel expenses related to trial. Consistent with this Court's
25 Order re Co-Lead Counsel (ECF No. 80), all flight costs for domestic air travel of less than six
26 hours are at coach class fares regardless of the class flown, with only travel exceeding six hours of
27

1 flight time eligible to be at business class fares. Per diem expenses on travel days were limited to
2 \$125 per person, exclusive of lodging and transportation. A listing of the out-of-town travel trips
3 is set forth in Exhibit D.

4 b. Computer Research, Databases & Docket Fees: \$78.12. These costs reflect
5 expenses attributable to the use of Lexis/Westlaw in connection with the Action.

6 c. Witness, Service and Filing Fees: \$804.00. Harris Legal Advisors LLC paid costs
7 related to the costs for filing two complaints, which were performed by local counsel. The vendors
8 paid are set forth in Exhibit E.

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

10 Executed this 20th day of August, 2026, at Columbus, Ohio.

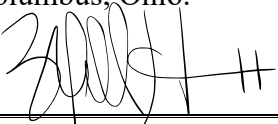
11 
12 _____
13 William D. Harris II

EXHIBIT A – Lodestar by Timekeeper
Time Period: Inception through July 31, 2025

Attorneys	Role	Total Hours	Hourly Rate	Total Lodestar
William D. Harris II	Partner	1,354.50	\$1,181.00	\$1,599,664.50
Ryan P. Wagenleitner	Of Counsel	154.80	\$750.00	\$116,100.00
TOTAL:		1,509.3		\$1,715,764.50

EXHIBIT B – Hours by Category**Time Period: Inception through July 31, 2025**

Attorneys	Role	Hours by Category														Total Hours	Current Rate	Lodestar
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)			
William D. Harris II	Partner	28.7	34.5	286.7	171.8	226.9	0	154	77.8	4.6	22.6	186.9	1.6	39.8	118.6	1,354.50	\$1,181	\$1,599,664.50
Ryan P. Wagenleitner	Of Counsel	0	0	94.1	0.3	35.2	0	5.4	0	0	0	0	0	19.5	0.3	154.8	\$750	\$116,100.00
TOTAL:		28.7	34.5	380.8	172.1	262.1	0	159.4	77.8	4.6	22.6	186.9	1.6	59.3	118.9	1,509.30		\$1,715,764.50

Key:

(1) Investigation

(2) Pleadings

(complaint/answer)

(3) Discovery Produced by
Defendants(4) Discovery Produced by
Plaintiffs(5) Motions & Legal
Research

(6) Court Appearances

(7) Expert Discovery
(including consultants)

(8) Mediation

(9) Settlement

(10) Class Certification

(11) Trial Prep & Trial

(12) Appeal

(13) Litigation Strategy &
Analysis

(14) Case Management

EXHIBIT C – Firm Expenses

Time Period: Inception through July 31, 2025

Expense Categories	Expenses
Outside Duplicating	\$0.00
In-House Duplicating/Printing	\$0.00
Witness/Service/Filing Fees	\$804.00
Court & Deposition Reporting/Transcripts	\$0.00
Computer Research/Databases/Docket Fees	\$78.12
Long Distance Telephone/Conference Calling	\$0.00
Postage/Overnight Mail/Messenger	\$0.00
Expert/Consultant Fees	\$0.00
Mediation Fees	\$0.00
Litigation Support/Document Hosting	\$0.00
Travel (air/ground transportation, meals, hotel)	\$4914.36
Local Work-Related Transportation/Meals	\$0.00
Miscellaneous	\$0.00
TOTAL	\$5,796.48

EXHIBIT D

Out of Town Travel - Airfare, Lodging, Meals, Transportation: \$4,914.36

<u>Name</u>	<u>Date</u>	<u>Destination/Location</u>	<u>Purpose</u>
William D. Harris II	7/19/2025 – 7/23/2025	San Francisco	Trial
William D. Harris II	7/30/2025 – 8/2/25	San Francisco	Trial

EXHIBIT E

Witness, Service and Filing Fees: \$804.00

<u>Date</u>	<u>Vendor</u>	<u>Purpose</u>
4/26/2021	Northern District of California	Filing of Complaint
8/10/2021	Northern District of California	Filing of Complaint

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@sec.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF KENT M.
WILLIAMS IN SUPPORT OF CLASS
COUNSEL'S MOTION FOR AWARD
OF ATTORNEYS' FEES AND
EXPENSES, AND PLAINTIFFS'
APPLICATION FOR SERVICE
AWARDS**

1 I, Kent M. Williams, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as
2 follows:

3 1. I am an attorney duly licensed to practice before the courts of the state and federal
4 bars of Minnesota and am admitted *pro hac vice* before this Court. Prior to March 13, 2025, I was
5 a solo practitioner operating as Williams Law Firm (“WLF”); on that date I merged my practice
6 with the law firm Siri & Glimstad LLP (“S&G”) as a Partner. At all pertinent times I have been
7 one of the counsel of record for Plaintiffs Leah Ridgway and Autumn Meigs in the above-
8 captioned action (the “Action”). I submit this declaration in support of Class Counsel’s Motion for
9 Award of Attorneys’ Fees and Expenses and Plaintiffs’ Application for Service Awards (“Fee and
10 Expense Application”) filed concurrently herewith.

11 2. The statements herein are true to the best of my personal knowledge, information,
12 and belief based on the books and records of WLF and S&G and information received from S&G
13 attorneys and staff.

14 3. Unless otherwise defined, capitalized terms herein have the same meaning as in the
15 Settlement Agreements between Plaintiffs and Flurry LLC (“Flurry”), Google LLC (“Google”),
16 and Flo Health, Inc. (“Flo”). *See* ECF Nos. 589-2, 820-2, 820-3.

17 4. At the direction of the Court-appointed Co-Class Counsel for the Plaintiffs and the
18 Class, Christian Levis of Lowey Dannenberg, P.C. (“Lowey”), Carol Villegas of Labaton Keller
19 Sucharow LLP (“Labaton”) and Diana J. Zinser of Spector Caldes & Corrigan, PC (“SCC”),
20 (collectively referred to as “Class Counsel”), I have contributed time and resources to the
21 prosecution of the Action resulting in the achievement of the Settlements before the Court.

22 5. For purposes of this Fee and Expense Declaration, the schedules attached as Exhibit
23 A and B summarize my hours and lodestar from inception of this Action through July 31, 2025
24 (when the trial in this Action concluded) and include a breakdown of the hours by category of
25 work. The total hours were determined by the examination of contemporaneous, daily time records
26 regularly prepared and maintained by my firm. Lodestar calculations for the time incurred are
27 based on my standard current hourly rates and were prepared based upon daily time records

maintained by myself and professional support staff at WLF and S&G. The lodestar figures do not include costs related to expense items. I have reviewed my time records to confirm both the accuracy of the entries as well as the necessity for and reasonableness of the time expended in this litigation. As a result of this review, I made certain reductions to my time and lodestar either in the exercise of “billing judgment” or to conform with the requirements of this matter. Time spent by attorneys and staff who worked fewer than 10 hours on the case has been omitted from the lodestar calculation; consequently, I am the only attorney from WLF or S&G submitting time in this Action. General read/review time has been omitted; only time spent reviewing or analyzing pleadings, orders, documents, and other communications at the direction of Class Counsel is included in the hours and lodestar calculations.

6. The time set forth in this Declaration does not include any work performed after the conclusion of the jury trial in the Action on or around July 31, 2025. To the extent there is a fee and expense application submitted in connection with the judgment entered for the jury verdict in this Action achieved against Meta Platforms, Inc. (“Meta”), such application will report the total hours invested in this Action, including all work performed after July 31, 2025.

7. My hourly rate is the same as the usual and customary hourly rate used for my services in contingent and non-contingent matters. Last year, my then-rate of \$1,145 per hour was deemed reasonable in the following arbitrations:

Fish v. Valve Corporation, AAA Case No. 1-23-0005-3288 (Goins, F.)

Birenbaum v. Valve Corporation, AAA Case No. 1-23-0005-3145 (McSorley, S.)

Vicente v. Valve Corporation, AAA Case No. 1-23-0005-3352 (McSorley, S.)

8. The services I performed on behalf of the Class include, but are not limited, the following:

(a) Factual investigation and legal research regarding the claims of my clients and the class;

(b) Drafting and negotiating subpoenas to third parties, and conducting other third-party discovery;

- (c) Drafting interrogatories and document requests to the defendants;
- (d) Reviewing and analyzing documents produced by the defendants;
- (e) Assisting my clients with answering discovery propounded by the defendants;
- (f) Preparing for and defending the deposition of Autumn Meigs;
- (g) Meeting with the plaintiffs' expert witnesses;
- (h) Preparing for and taking the deposition of defense expert Lesley Chiou;
- (i) Drafting and editing motions and supporting memoranda;
- (j) Attending mediations; and
- (k) Meeting with co-counsel to discuss litigation strategy and other relevant matters.

9. The total time for which I am requesting an award of legal fees is 1,025 hours. The total lodestar value of these professional services is \$1,260,873.00.

10. Attached as Exhibit C is a schedule of my expenses reasonably incurred in connection with this Action for which reimbursement is requested. Expense items are recorded separately from time, and are not duplicated in the firm's current hourly rates. Further, expense items do not contain any general overhead costs, and do not contain a surcharge over the amount incurred.

11. As detailed and categorized in the schedule attached as Exhibit C, I incurred a total of \$8,193.00 in expenses from inception through July 31, 2025. The schedule is based upon expense records recorded in WLF's books and records. These books and records are prepared from check records, invoices, receipts, and other source materials.

12. The following is additional information regarding certain of these expenses:

a. Computer Research, Databases & Docket Fees: \$8,025.00. These costs reflect expenses attributable to my use of Westlaw in connection with the Action.

b. In-House and Outside Duplicating: \$168.00. In connection with this case, I made 1,680 black and white copies at \$.10/page.

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

2 Executed this 20th day of August, 2026, in Minneapolis, Minnesota.

3

4

/s/ Kent M. Williams

Kent M. Williams

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

EXHIBIT A – Lodestar by Timekeeper
Time Period: Inception through July 31, 2025

Attorneys	Role	Total Hours	Hourly Rate	Total Lodestar
Kent Williams	Counsel	1,025.1	\$1,230.00	\$1,260,873.00

EXHIBIT B – Hours by Category
Time Period: Inception through July 31, 2025

		Hours by Category																
Attorneys	Role	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	Total Hours	Current Rate	Lodestar
Kent Williams	Partner	12.1	58.0	339.6	138.3	161.7	2.5	128.4	7.6	68.4	13.4	0	0	13.4	22.0	1025.1	\$1,230	\$1,260,873.00

Key:

- (1) Investigation
- (2) Pleadings (complaint/answer)
- (3) Discovery Produced by Defendants
- (4) Discovery Produced by Plaintiffs
- (5) Motions & Legal Research
- (6) Court Appearances
- (7) Expert Discovery (including consultants)
- (8) Mediation
- (9) Settlement
- (10) Class Certification
- (11) Trial Prep & Trial
- (12) Appeal
- (13) Litigation Strategy & Analysis
- (14) Case Management

EXHIBIT C – Firm Expenses
Time Period: Inception through July 31, 2025

Expense Categories	Expenses
In-House Duplicating/Printing	\$168.00
Computer Research/Databases/Docket Fees	\$8,025.00
TOTAL	\$8,193.00

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@sec.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF AUTUMN MEIGS
IN SUPPORT OF CLASS COUNSEL'S
MOTION FOR AWARD OF
ATTORNEYS' FEES AND EXPENSES,
AND PLAINTIFFS' APPLICATION
FOR SERVICE AWARDS**

1 I, Autumn Meigs, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am one of the Named Plaintiffs and Class Representatives in this Action. I
3 respectfully submit this Declaration in support of: (a) the Class Counsel’s Motion for Attorneys’
4 Fees and Expenses and Plaintiffs’ Application for Service Awards, filed herewith; and (b)
5 Plaintiffs’ Motion for Final Approval. I have personal knowledge of all the facts stated herein, and
6 if called to testify as a witness, I could and would competently testify to them.

7 2. Unless otherwise defined, capitalized terms herein have the same meaning as in the
8 Settlement Agreements between Plaintiffs and Flurry LLC (“Flurry”), Google LLC (“Google”),
9 and Flo Health, Inc. (“Flo”). *See* ECF Nos. 589-2, 820-2, 820-3.

10 3. On April 26, 2021, I filed a Complaint in this Action and chose to serve as a class
11 representative because I believe that privacy is an important right and Defendants’ alleged
12 surreptitious collection, storage, and dissemination of my intimate and personal health information
13 violated my privacy.

14 4. I am not aware of any conflict of interest that I could have with any other Class
15 Member, and I am willing and able to continue as a Class Representative.

16 5. I retained attorneys experienced in consumer protection and data privacy class
17 action litigation to represent me in this matter. At the outset of the case, I was informed of and
18 understood my duties as a class representative, and believe that I have fulfilled these duties.

19 6. At all times during this litigation, I have endeavored to fully discharge my
20 obligations as a Class Representative. To that end, I have: (1) routinely communicated with Class
21 Counsel including through attorneys at Harris Legal Advisors LLC (“HLA”), concerning this
22 Action; (2) remained fully informed about case developments; (3) routinely reviewed the various
23 pleadings filed in this Action; (4) searched for and produced documents; (5) responded to
24 Defendants’ document requests and interrogatories; (6) prepared for and sat for a deposition; (7)
25 testified on direct and cross-examination during the trial against Flo and Meta; and (8) conferred
26 with my attorneys to understand and approve the terms of the Settlements. I agreed to the terms
27 set forth in the Settlement Agreements, subject to the Court’s approval.

1 7. Over the span of more than five years, I have faithfully and diligently discharged
2 my duties as a Class Representative, and I have worked closely with my attorneys to ensure the
3 efficient and effective prosecution of the Action. In doing so, I have expended valuable effort and
4 time.

5 8. For example, I extensively discussed with attorneys at Harris Legal Advisors, the
6 personal and sensitive nature of the privacy violations that I believe occurred and had
7 conversations with William D. Harris II to understand the responsibilities that I would have as a
8 representative of the proposed classes. I reviewed the draft complaint and, when necessary,
9 provided edits to the allegations that related to my experience before the complaint was filed.
10 Throughout the litigation, I maintained contact with Mr. Harris to stay up to date regarding the
11 progress of the litigation.

12 9. During the discovery phase of the litigation, I worked with Mr. Harris to provide
13 written responses to Defendants' discovery requests and interrogatories. I reviewed Defendants'
14 Requests for Production of Documents ("RFPs") and conferred with my attorneys to understand
15 these RFPs. I spent several hours searching for and providing documents to my attorneys and
16 ultimately produced several documents responsive to the RFPs. I also reviewed Defendants'
17 Interrogatories and met with my attorneys to discuss and respond to these Interrogatories. I then
18 reviewed the draft responses to the Interrogatories to ensure the accuracy of the responses.

19 10. On January 5 and 6, 2023, I was deposed for approximately twelve (12) total hours.
20 In advance of the deposition, I met with HLA attorneys and Mr. Kent Williams (now of Siri &
21 Glimstad LLP), for several hours and also independently prepared to provide testimony. This
22 preparation involved a substantial investment of time and effort. I also reviewed the entire
23 transcript of my deposition to ensure the accuracy of the transcription.

24 11. On July 22, 2025, I testified during the two-week trial and was also cross-examined,
25 for a total of approximately 40 minutes, answering highly personal questions relating to
26 menstruation and pregnancies in front of the jury.

27 12. As the litigation progressed, I continued to engage with my attorneys and otherwise

1 assisted in representing the interests of the other Class Members throughout the settlement process.

2 13. Based on the considerable time and effort I spent in protecting the Settlement
3 Classes' interests in this Action, I support this application for a service award of \$25,000.

4 14. I have reviewed the Settlements and believe that the terms are fair, reasonable and
5 in the best interest of the Class Members.

6 15. I understand that Plaintiffs' Counsel have invested considerable time and effort
7 prosecuting this Action on my and the Settlement Classes' behalf. This includes advancing
8 hundreds of thousands of dollars in expenses and spending thousands of hours over years of hard-
9 fought litigation, with no guarantee of recovery or payment. I therefore support this application for
10 reimbursement of attorneys' fees and expenses in an amount approved by the Court that is fair and
11 reasonable and accounts for the uncertainty of the recovery and the considerable time and effort
12 spent by Plaintiffs' Counsel in prosecuting this Action.

13 16. I remain ready, willing, and able to continue to represent the interests of the
14 Settlement Classes throughout the Settlement approval process.

15 ***

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

17
18 Executed this 19th day of August, 2026, at Cleveland, Ohio.

19 *Autumn Meigs*

20 _____
Autumn Meigs

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@scc.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF ERICA FRASCO
IN SUPPORT OF CLASS COUNSEL'S
MOTION FOR AWARD OF
ATTORNEYS' FEES AND EXPENSES,
AND PLAINTIFFS' APPLICATION
FOR SERVICE AWARDS**

1 I, Erica Frasco, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am one of the Named Plaintiffs and Class Representatives in this Action. I
3 respectfully submit this Declaration in support of: (a) the Class Counsel's Motion for Attorneys'
4 Fees and Expenses and Plaintiffs' Application for Service Awards, filed herewith; and (b)
5 Plaintiffs' Motion for Final Approval. I have personal knowledge of all the facts stated herein, and
6 if called to testify as a witness, I could and would competently testify to them.

7 2. Unless otherwise defined, capitalized terms herein have the same meaning as in the
8 Settlement Agreements between Plaintiffs and Flurry LLC ("Flurry"), Google LLC ("Google"),
9 and Flo Health, Inc. ("Flo"). *See* ECF Nos. 589-2, 820-2, 820-3.

10 3. On January 29, 2021, I filed a Complaint in this Action and chose to serve as a class
11 representative because I believe that privacy is an important right and Defendants' alleged
12 surreptitious collection, storage, and dissemination of my intimate and personal health information
13 violated my privacy.

14 4. I am not aware of any conflict of interest that I could have with any other Class
15 Member, and I am willing and able to continue as a Class Representative.

16 5. I retained attorneys experienced in consumer protection and data privacy class
17 action litigation to represent me in this matter. At the outset of the case, I was informed of and
18 understood my duties as a class representative, and believe that I have fulfilled these duties.

19 6. At all times during this litigation, I have endeavored to fully discharge my
20 obligations as a Class Representative. To that end, I have: (1) routinely communicated with Class
21 Counsel including attorneys Christian Levis and Amanda Fiorilla of Lowey Dannenberg, P.C.
22 ("Lowey"), concerning this Action; (2) remained fully informed about case developments; (3)
23 routinely reviewed the various pleadings filed in this Action; (4) searched for and produced
24 documents; (5) responded to Defendants' document requests and interrogatories; (6) prepared for
25 and sat for a deposition; (7) testified on direct and cross-examination during the trial against Flo
26 and Meta; and (8) conferred with my attorneys to understand and approve the terms of the
27 Settlements. I agreed to the terms set forth in the Settlement Agreements, subject to the Court's

1 approval.

2 7. Over the span of more than five years, I have faithfully and diligently discharged
3 my duties as a Class Representative, and I have worked closely with my attorneys to ensure the
4 efficient and effective prosecution of the Action. In doing so, I have expended valuable effort and
5 time.

6 8. For example, I extensively discussed with attorneys at Lowey the personal and
7 sensitive nature of the privacy violations that I believe occurred and had conversations with Mr.
8 Levis and Ms. Fiorilla to understand the responsibilities that I would have as a representative of the
9 proposed classes. I reviewed the draft complaint and, when necessary, provided edits to the
10 allegations that related to my experience before the complaint was filed. Throughout the litigation,
11 I maintained contact with Mr. Levis and Ms. Fiorilla to stay up to date regarding the progress of
12 the litigation.

13 9. During the discovery phase of the litigation, I worked with Ms. Fiorilla to provide
14 written responses to Defendants' discovery requests and interrogatories. I reviewed Defendants'
15 Requests for Production of Documents ("RFPs") and conferred with my attorneys to understand
16 these RFPs. I spent several hours searching for and providing documents to my attorneys and
17 ultimately produced several documents responsive to the RFPs. I also reviewed Defendants'
18 Interrogatories and met with my attorneys to discuss and respond to these Interrogatories. I then
19 reviewed the draft responses to the Interrogatories to ensure the accuracy of the responses.

20 10. On January 23, 2023, I was deposed for approximately 8 hours (including breaks).
21 In advance of the deposition, I met with Lowey attorneys for several hours and also independently
22 prepared to provide testimony. This preparation involved a substantial investment of time and
23 effort. I also reviewed the entire transcript of my deposition to ensure the accuracy of the
24 transcription.

25 11. On July 22, 2025, I testified during the two-week trial and was also cross-examined,
26 for approximately two hours, answering highly personal questions relating to menstruation and my
27 reproductive health in front of the jury.

12. As the litigation progressed, I continued to engage with my attorneys and otherwise assisted in representing the interests of the other Class Members throughout the settlement process.

13. Based on the considerable time and effort I spent in protecting the Settlement Classes' interests in this Action, I support this application for a service award of \$25,000.

14. I have reviewed the Settlements and believe that the terms are fair, reasonable and in the best interest of the Class Members.

15. I understand that Plaintiffs' Counsel have invested considerable time and effort prosecuting this Action on my and the Settlement Classes' behalf. This includes advancing hundreds of thousands of dollars in expenses and spending thousands of hours over years of hard-fought litigation, with no guarantee of recovery or payment. I therefore support this application for reimbursement of attorneys' fees and expenses in an amount approved by the Court that is fair and reasonable and accounts for the uncertainty of the recovery and the considerable time and effort spent by Plaintiffs' Counsel in prosecuting this Action.

16. I remain ready, willing, and able to continue to represent the interests of the Settlement Classes throughout the Settlement approval process.

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

Executed this 14th day of August, 2026, in Riverdale, New Jersey.


Erica Frasco (Aug 14, 2026 18:51:44 EDT)

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
 44 South Broadway, Suite 1100
 White Plains, NY 10601
 Tel: (914) 997-0500
 Fax: (914) 997-0035
 clevis@lowey.com

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
 2001 Market Street, Suite 3420
 Philadelphia, PA 19103
 Tel: (215) 496-0300
 Fax: (215) 496-6611
 dzinser@scc.law

*Co-Lead Class Counsel for Plaintiffs
 and the Class*

*Co-Lead Class Counsel for Plaintiffs
 and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
 140 Broadway
 New York, NY 10005
 Tel.: (212) 907-0700
 Fax: (212) 818-0477
 cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
 and the Class*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
 behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
 INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF JENNIFER CHEN
 IN SUPPORT OF CLASS COUNSEL'S
 MOTION FOR AWARD OF
 ATTORNEYS' FEES AND EXPENSES,
 AND PLAINTIFFS' APPLICATION
 FOR SERVICE AWARD**

1 I, Jennifer Chen, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as
2 follows:

3 1. I am one of the Named Plaintiffs and Class Representatives in this Action. I am
4 a resident of the state of California, and have been a resident of the state of California at all
5 times during the actions giving rise to this Action and through the pendency of this Action. I
6 respectfully submit this Declaration in support of: (a) the Class Counsel's Motion for
7 Attorneys' Fees and Expenses and Plaintiffs' Application for Service Awards, filed herewith;
8 and (b) Plaintiffs' Motion for Final Approval. I have personal knowledge of all the facts stated
9 herein, and if called to testify as a witness, I could and would competently testify to them.

10 2. Unless otherwise defined, capitalized terms herein have the same meaning as
11 in the Settlement Agreements between Plaintiffs and Flurry LLC ("Flurry"), Google LLC
12 ("Google"), and Flo Health, Inc. ("Flo"). *See* ECF Nos. 589-2, 820-2, 820-3.

13 3. On March 2, 2023, I filed a Complaint in this Action (originally filed in this
14 District as Case No. 3:21-cv-01485) and chose to serve as a class representative because I
15 believe that privacy is an important right and Defendants' alleged surreptitious collection,
16 storage, and dissemination of my intimate and personal health information violated my
17 privacy.

18 4. I am not aware of any conflict of interest that I could have with any other Class
19 Member, and I am willing and able to continue as a Class Representative.

20 5. I retained attorneys experienced in consumer protection and data privacy class
21 action litigation to represent me in this matter. At the outset of the case, I was informed of and
22 understood my duties as a class representative, and believe that I have fulfilled these duties.

23 6. At all times during this litigation, I have endeavored to fully discharge my
24 obligations as a Class Representative. To that end, I have: (1) routinely communicated with
25 Class Counsel, including Alexis M. Wood and Kas L. Gallucci, attorneys at Marron PC
26 concerning this Action; (2) remained fully informed about case developments; (3) routinely
27 reviewed the various pleadings filed in this Action; (4) searched for and produced documents,

1 providing full access to my personal email account; (5) responded to Defendants' document
2 requests and interrogatories; (6) prepared for and sat for a deposition; (7) testified on direct
3 and cross-examination during the trial against Flo and Meta; and (8) conferred with my
4 attorneys to understand and approve the terms of the Settlements. I agreed to the terms set forth
5 in the Settlement Agreements, subject to the Court's approval.

6 7. Over the span of more than five years, I have faithfully and diligently discharged
7 my duties as a Class Representative, and I have worked closely with my attorneys to ensure the
8 efficient and effective prosecution of the Action. In doing so, I have expended valuable effort and
9 time. I had countless telephone calls and video conference calls with my attorneys Alexis M.
10 Wood and Kas L. Gallucci, and exchanged numerous written correspondences with them.

11 8. For example, I extensively discussed with attorneys at Marron PC the personal and
12 sensitive nature of the privacy violations that I believe occurred and had conversations with Alexis
13 M. Wood and Kas L. Gallucci to understand the responsibilities that I would have as a
14 representative of the proposed classes. I reviewed the draft complaint and, when necessary,
15 provided edits to the allegations that related to my experience before the complaint was filed.
16 Throughout the litigation, I maintained contact with Alexis M. Wood and Kas L. Gallucci to stay
17 up to date regarding the progress of the litigation.

18 9. During the discovery phase of the litigation, I worked with Alexis M Wood and
19 Kas L. Gallucci to provide written responses to Defendants' discovery requests and interrogatories.
20 I reviewed Defendants' Requests for Production of Documents ("RFPs") and conferred with my
21 attorneys to understand these RFPs. I spent several hours searching for and providing documents
22 to my attorneys, including providing full access to my private and personal email account, and
23 ultimately produced several documents responsive to the RFPs. I also reviewed Defendants'
24 Interrogatories and met with my attorneys to discuss and respond to these Interrogatories. I then
25 reviewed the draft responses to the Interrogatories to ensure the accuracy of the responses through
26 the verification process. I also reviewed and verified all amended and supplemental responses.
27

1 10. On January 20, 2023, I was deposed for approximately 6 hours and 31 minutes (my
2 deposition started at 9:02am and ended at 3:33pm. In advance of the deposition, I met with
3 attorneys Alexis M. Wood and Kas L. Gallucci for several hours and also independently prepared
4 to provide testimony. This preparation involved a substantial investment of time and effort. I also
5 reviewed the entire transcript of my deposition to ensure the accuracy of the transcription.

6 11. I also flew up to San Francisco to participate in trial proceedings. I attended multiple
7 full days of Court, including opening statements. On July 22, 2025, I testified during the two-
8 week trial and was also cross-examined, for approximately 30 minutes, answering highly personal
9 questions relating to menstruation and pregnancies in front of the jury.

10 12. As the litigation progressed, I continued to engage with my attorneys and otherwise
11 assisted in representing the interests of the other Class Members throughout the settlement process.

12 13. Based on the considerable time and effort I spent in protecting the Settlement
13 Classes' interests in this Action, I support this application for a service award of \$25,000.

14 14. I have reviewed the Settlements and believe that the terms are fair, reasonable and
15 in the best interest of the Class Members.

16 15. I understand that Plaintiffs' Counsel have invested considerable time and effort
17 prosecuting this Action on my and the Settlement Classes' behalf. This includes advancing
18 hundreds of thousands of dollars in expenses and spending thousands of hours over years of hard-
19 fought litigation, with no guarantee of recovery or payment. I therefore support this application for
20 reimbursement of attorneys' fees and expenses in an amount approved by the Court that is fair and
21 reasonable and accounts for the uncertainty of the recovery and the considerable time and effort
22 spent by Plaintiffs' Counsel in prosecuting this Action.

23 16. I remain ready, willing, and able to continue to represent the interests of the
24 Settlement Classes throughout the Settlement approval process.

25 ***
26
27

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

2
3 Executed this 20th day of August, 2026, at Irvine, California.

Signed by:

4 

5
6 Jennifer Chen

4BABB8335365461...

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@scc.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF JUSTINE
PIETRZYK IN SUPPORT OF CLASS
COUNSEL'S MOTION FOR AWARD
OF ATTORNEYS' FEES AND
EXPENSES, AND PLAINTIFFS'
APPLICATION FOR SERVICE
AWARDS**

1 I, Justine Pietrzyk, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as
2 follows:

3 1. I am one of the Named Plaintiffs in this Action. I respectfully submit this
4 Declaration in support of: (a) the Class Counsel's Motion for Attorneys' Fees and Expenses and
5 Plaintiffs' Application for Service Awards, filed herewith; and (b) Plaintiffs' Motion for Final
6 Approval. I have personal knowledge of all the facts stated herein, and if called to testify as a
7 witness, I could and would competently testify to them.

8 2. Unless otherwise defined, capitalized terms herein have the same meaning as in the
9 Settlement Agreements between Plaintiffs and Flurry LLC ("Flurry"), Google LLC ("Google"),
10 and Flo Health, Inc. ("Flo"). *See* ECF Nos. 589-2, 820-2, 820-3.

11 3. On February 16, 2021, I filed a Complaint in this Action and chose to serve as a
12 putative class representative because I believe that privacy is an important right and Defendants'
13 alleged surreptitious collection, storage, and dissemination of my intimate and personal health
14 information violated my privacy.

15 4. I am not aware of any conflict of interest that I could have with any other Class
16 Member.

17 5. I retained attorneys experienced in consumer protection and data privacy class
18 action litigation to represent me in this matter. At the outset of the case, I was informed of and
19 understood my duties as a putative class representative, and believe that I have fulfilled these
20 duties.

21 6. At all times during this litigation, I have endeavored to fully discharge my
22 obligations as a putative Class Representative. To that end, I have: (1) routinely communicated
23 with Class Counsel including attorneys at Spector Caldes Corrigan concerning this Action; (2)
24 remained fully informed about case developments; (3) routinely reviewed the various pleadings
25 filed in this Action; (4) searched for and produced documents; (5) responded to Defendants'
26 document requests and interrogatories; (6) prepared for and sat for a deposition; and (7) conferred
27 with my attorneys to understand and approve the terms of the Settlements. I agreed to the terms

1 set forth in the Settlement Agreements, subject to the Court's approval.

2 7. Over the span of more than five years, I have faithfully and diligently discharged
3 my duties as a putative Class Representative, and I have worked closely with my attorneys to
4 ensure the efficient and effective prosecution of the Action. In doing so, I have expended valuable
5 effort and time.

6 8. For example, I extensively discussed with attorneys at Spector Caldes Corrigan
7 the personal and sensitive nature of the privacy violations that I believe occurred and had
8 conversations with Class Counsel Diana Zinser to understand the responsibilities that I would have
9 as a representative of the proposed classes. I reviewed the draft complaint and, when necessary,
10 provided edits to the allegations that related to my experience before the complaint was filed.
11 Throughout the litigation, I maintained contact with Ms. Zinser to stay up to date regarding the
12 progress of the litigation.

13 9. During the discovery phase of the litigation, I worked with Ms. Zinser and other
14 attorneys at Spector Caldes Corrigan to provide written responses to Defendants' discovery
15 requests and interrogatories. I reviewed Defendants' Requests for Production of Documents
16 ("RFPs") and conferred with my attorneys to understand these RFPs. I spent several hours
17 searching for and providing documents to my attorneys and ultimately produced several
18 documents responsive to the RFPs. I also reviewed Defendants' Interrogatories and met with my
19 attorneys to discuss and respond to these Interrogatories. I then reviewed the draft responses to the
20 Interrogatories to ensure the accuracy of the responses.

21 10. On January 27, 2023, I was deposed for approximately seven hours. In advance of
22 the deposition, I met with Spector Caldes Corrigan attorneys for several hours and also
23 independently prepared to provide testimony. This preparation involved a substantial investment
24 of time and effort. I also reviewed the entire transcript of my deposition to ensure the accuracy of
25 the transcription.

26 11. As the litigation progressed, I continued to engage with my attorneys and otherwise
27 assisted in representing the interests of the Class throughout the settlement process.

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@sec.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF LEAH RIDGWAY
IN SUPPORT OF CLASS COUNSEL'S
MOTION FOR AWARD OF
ATTORNEYS' FEES AND EXPENSES,
AND PLAINTIFFS' APPLICATION
FOR SERVICE AWARDS**

1 I, Leah Ridgway, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am one of the Named Plaintiffs in this Action. I respectfully submit this
3 Declaration in support of: (a) the Class Counsel’s Motion for Attorneys’ Fees and Expenses and
4 Plaintiffs’ Application for Service Awards, filed herewith; and (b) Plaintiffs’ Motion for Final
5 Approval. I have personal knowledge of all the facts stated herein, and if called to testify as a
6 witness, I could and would competently testify to them.

7 2. Unless otherwise defined, capitalized terms herein have the same meaning as in the
8 Settlement Agreements between Plaintiffs and Flurry LLC (“Flurry”), Google LLC (“Google”),
9 and Flo Health, Inc. (“Flo”). *See* ECF Nos. 589-2, 820-2, 820-3.

10 3. On April 26, 2021, I filed a Complaint in this Action and chose to serve as a named
11 plaintiff because I believe that privacy is an important right and Defendants’ alleged surreptitious
12 collection, storage, and dissemination of my intimate and personal health information violated my
13 privacy.

14 4. I am not aware of any conflict of interest that I could have with any other Class
15 Member.

16 5. I retained attorneys experienced in consumer protection and data privacy class
17 action litigation to represent me in this matter. At the outset of the case, I was informed of and
18 understood my duties as a named plaintiff, and believe that I have fulfilled these duties.

19 6. At all times during this litigation, I have endeavored to fully discharge my
20 obligations as a named plaintiff. To that end, I have: (1) routinely communicated with Class
21 Counsel including through attorneys at Harris Legal Advisors LLC (“HLA”), concerning this
22 Action; (2) remained fully informed about case developments; (3) routinely reviewed the various
23 pleadings filed in this Action; (4) searched for and produced documents; (5) responded to
24 Defendants’ document requests and interrogatories; (6) prepared for and sat for a deposition; and
25 (7) conferred with my attorneys to understand and approve the terms of the Settlements. I agreed
26 to the terms set forth in the Settlement Agreements, subject to the Court’s approval.

27 7. Over the span of more than five years, I have faithfully and diligently discharged

1 my duties as a named plaintiff, and I have worked closely with my attorneys to ensure the efficient
2 and effective prosecution of the Action. In doing so, I have expended valuable effort and time.

3 8. For example, I extensively discussed with attorneys at Harris Legal Advisors the
4 personal and sensitive nature of the privacy violations that I believe occurred and had
5 conversations with William D. Harris II to understand the responsibilities that I would have as a
6 representative of the proposed classes. I reviewed the draft complaint and, when necessary,
7 provided edits to the allegations that related to my experience before the complaint was filed.
8 Throughout the litigation, I maintained contact with Mr. Harris to stay up to date regarding the
9 progress of the litigation.

10 9. During the discovery phase of the litigation, I worked with Mr. Harris to provide
11 written responses to Defendants' discovery requests and interrogatories. I reviewed Defendants'
12 Requests for Production of Documents ("RFPs") and conferred with my attorneys to understand
13 these RFPs. I spent several hours searching for and providing documents to my attorneys and
14 ultimately produced several documents responsive to the RFPs. I also reviewed Defendants'
15 Interrogatories and met with my attorneys to discuss and respond to these Interrogatories. I then
16 reviewed the draft responses to the Interrogatories to ensure the accuracy of the responses.

17 10. On January 12, 2023, I was deposed for approximately nine (9) total hours. In
18 advance of the deposition, I met with HLA attorneys and Mr. Kent Williams (now of Siri &
19 Glimstad LLP), for several hours and also independently prepared to provide testimony. This
20 preparation involved a substantial investment of time and effort. I also reviewed the entire
21 transcript of my deposition to ensure the accuracy of the transcription.

22 11. As the litigation progressed, I continued to engage with my attorneys and otherwise
23 assisted in representing the interests of the other Class Members throughout the settlement process.

24 12. Based on the considerable time and effort I spent in protecting the Settlement
25 Classes' interests in this Action, I support this application for a service award of \$10,000.

26 13. I have reviewed the Settlements and believe that the terms are fair, reasonable and
27 in the best interest of the Class Members.

15. I remain ready, willing, and able to continue to represent the interests of the Settlement Classes throughout the Settlement approval process.

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

Leah Ridgway

Leah Ridgway

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@scc.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF MADELINE KISS
IN SUPPORT OF CLASS COUNSEL'S
MOTION FOR AWARD OF
ATTORNEYS' FEES AND EXPENSES,
AND PLAINTIFFS' APPLICATION
FOR SERVICE AWARDS**

1 I, Madeline Kiss, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am one of the named Plaintiffs in this Action. I respectfully submit this
3 Declaration in support of: (a) the Class Counsel's Motion for Attorneys' Fees and Expenses and
4 Plaintiffs' Application for Service Awards, filed herewith; and (b) Plaintiffs' Motion for Final
5 Approval. I have personal knowledge of all the facts stated herein, and if called to testify as a
6 witness, I could and would competently testify to them.

7 2. Unless otherwise defined, capitalized terms herein have the same meaning as in the
8 Settlement Agreements between Plaintiffs and Flurry LLC ("Flurry"), Google LLC ("Google"),
9 and Flo Health, Inc. ("Flo"). *See* ECF Nos. 589-2, 820-2, 820-3.

10 3. On June 7, 2021, I filed a Complaint in this Action and chose to serve as a lead
11 plaintiff because I believe that privacy is an important right and Defendants' alleged surreptitious
12 collection, storage, and dissemination of my intimate and personal health information violated my
13 privacy.

14 4. I am not aware of any conflict of interest that I could have with any other Class
15 Member, and I am willing and able to continue as a lead plaintiff.

16 5. I retained attorneys experienced in consumer protection and data privacy class
17 action litigation to represent me in this matter. At the outset of the case, I was informed of and
18 understood my duties as a lead plaintiff, and believe that I have fulfilled these duties.

19 6. At all times during this litigation, I have endeavored to fully discharge my
20 obligations as a named Plaintiff. To that end, I have: (1) routinely communicated with Class
21 Counsel including attorneys at Labaton concerning this Action; (2) remained fully informed about
22 case developments; (3) routinely reviewed the various pleadings filed in this Action; (4) searched
23 for and produced documents; (5) responded to Defendants' document requests and interrogatories;
24 (6) prepared for and sat for a deposition; and (7) conferred with my attorneys to understand and
25 approve the terms of the Settlements. I agreed to the terms set forth in the Settlement Agreements,
26 subject to the Court's approval.

27 7. Over the span of more than five years, I have faithfully and diligently discharged

1 my duties as a named Plaintiff, and I have worked closely with my attorneys to ensure the efficient
2 and effective prosecution of the Action. In doing so, I have expended valuable effort and time.

3 8. For example, I extensively discussed with attorneys at Labaton the personal and
4 sensitive nature of the privacy violations that I believe occurred and had conversations with the
5 attorneys at Labaton to understand the responsibilities that I would have as a representative of the
6 proposed classes. I reviewed the draft complaint and, when necessary, provided edits to the
7 allegations that related to my experience before the complaint was filed. Throughout the litigation,
8 I maintained contact with the attorneys at Labaton to stay up to date regarding the progress of the
9 litigation.

10 9. During the discovery phase of the litigation, I worked with the attorneys at Labaton
11 to provide written responses to Defendants' discovery requests and interrogatories. I reviewed
12 Defendants' Requests for Production of Documents ("RFPs") and conferred with my attorneys to
13 understand these RFPs. I spent several hours searching for and providing documents to my
14 attorneys and ultimately produced several documents responsive to the RFPs. I also reviewed
15 Defendants' Interrogatories and met with my attorneys to discuss and respond to these
16 Interrogatories. I then reviewed the draft responses to the Interrogatories to ensure the accuracy
17 of the responses.

18 10. On January 17, 2023, I was deposed for approximately five hours. In advance of
19 the deposition, I met with the Labaton attorneys for several hours and also independently prepared
20 to provide testimony. This preparation involved a substantial investment of time and effort. I also
21 reviewed the entire transcript of my deposition to ensure the accuracy of the transcription.

22 11. As the litigation progressed, I continued to engage with my attorneys and otherwise
23 assisted in representing the interests of the other Class Members throughout the settlement process.

24 12. Based on the considerable time and effort I spent in protecting the Settlement
25 Classes' interests in this Action, I support this application for a service award of \$10,000.

26 13. I have reviewed the Settlements and believe that the terms are fair, reasonable and
27 in the best interest of the Class Members.

14. I understand that Plaintiffs' Counsel have invested considerable time and effort prosecuting this Action on my and the Settlement Classes' behalf. This includes advancing hundreds of thousands of dollars in expenses and spending thousands of hours over years of hard-fought litigation, with no guarantee of recovery or payment. I therefore support this application for reimbursement of attorneys' fees and expenses in an amount approved by the Court that is fair and reasonable and accounts for the uncertainty of the recovery and the considerable time and effort spent by Plaintiffs' Counsel in prosecuting this Action.

15. I remain ready, willing, and able to continue to represent the interests of the Settlement Classes throughout the Settlement approval process.

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

Executed this Tues day of August, 2026, at Wellfleet, MA.



Madeline Kiss

Madeline Kiss

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Tel: (914) 997-0500
Fax: (914) 997-0035
clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
140 Broadway
New York, NY 10005
Tel.: (212) 907-0700
Fax: (212) 818-0477
cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
2001 Market Street, Suite 3420
Philadelphia, PA 19103
Tel: (215) 496-0300
Fax: (215) 496-6611
dzinser@scc.law

*Co-Lead Class Counsel for Plaintiffs
and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF SARAH
WELLMAN IN SUPPORT OF CLASS
COUNSEL'S MOTION FOR AWARD
OF ATTORNEYS' FEES AND
EXPENSES, AND PLAINTIFFS'
APPLICATION FOR SERVICE
AWARDS**

1 I, Sarah Wellman, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am one of the Named Plaintiffs and Class Representatives in this Action. I
3 respectfully submit this Declaration in support of: (a) the Class Counsel's Motion for Attorneys'
4 Fees and Expenses and Plaintiffs' Application for Service Awards, filed herewith; and (b)
5 Plaintiffs' Motion for Final Approval. I have personal knowledge of all the facts stated herein, and
6 if called to testify as a witness, I could and would competently testify to them.

7 2. Unless otherwise defined, capitalized terms herein have the same meaning as in the
8 Settlement Agreements between Plaintiffs and Flurry LLC ("Flurry"), Google LLC ("Google"),
9 and Flo Health, Inc. ("Flo"). *See* ECF Nos. 589-2, 820-2, 820-3.

10 3. On February 12, 2021, I filed a Complaint in this Action and chose to serve as a
11 class representative because I believe that privacy is an important right and Defendants' alleged
12 surreptitious collection, storage, and dissemination of my intimate and personal health information
13 violated my privacy.

14 4. I am not aware of any conflict of interest that I could have with any other Class
15 Member, and I am willing and able to continue as a Class Representative.

16 5. I retained attorneys experienced in consumer protection and data privacy class
17 action litigation to represent me in this matter. At the outset of the case, I was informed of and
18 understood my duties as a class representative, and believe that I have fulfilled these duties.

19 6. At all times during this litigation, I have endeavored to fully discharge my
20 obligations as a Class Representative. To that end, I have: (1) routinely communicated with Class
21 Counsel including attorneys at Labaton concerning this Action; (2) remained fully informed about
22 case developments; (3) routinely reviewed the various pleadings filed in this Action; (4) searched
23 for and produced documents; (5) responded to Defendants' document requests and interrogatories;
24 (6) prepared for and sat for a deposition; (7) testified on direct and cross-examination during the
25 trial against Flo and Meta; and (8) conferred with my attorneys to understand and approve the
26 terms of the Settlements. I agreed to the terms set forth in the Settlement Agreements, subject to
27 the Court's approval.

1 7. Over the span of more than five years, I have faithfully and diligently discharged
2 my duties as a Class Representative, and I have worked closely with my attorneys to ensure the
3 efficient and effective prosecution of the Action. In doing so, I have expended valuable effort and
4 time.

5 8. For example, I extensively discussed with attorneys at Labaton the personal and
6 sensitive nature of the privacy violations that I believe occurred and had conversations with
7 attorneys at Labaton to understand the responsibilities that I would have as a representative of the
8 proposed classes. I reviewed the draft complaint and, when necessary, provided edits to the
9 allegations that related to my experience before the complaint was filed. Throughout the litigation,
10 I maintained contact with the attorneys at Labaton to stay up to date regarding the progress of the
11 litigation.

12 9. During the discovery phase of the litigation, I worked with attorneys at Labaton to
13 provide written responses to Defendants' discovery requests and interrogatories. I reviewed
14 Defendants' Requests for Production of Documents ("RFPs") and conferred with my attorneys to
15 understand these RFPs. I spent several hours searching for and providing documents to my
16 attorneys and ultimately produced several documents responsive to the RFPs. I also reviewed
17 Defendants' Interrogatories and met with my attorneys to discuss and respond to these
18 Interrogatories. I then reviewed the draft responses to the Interrogatories to ensure the accuracy
19 of the responses.

20 10. On January 11, 2023, I was deposed for approximately five hours. In advance of
21 the deposition, I met with the Labaton attorneys for several hours and also independently prepared
22 to provide testimony. This preparation involved a substantial investment of time and effort. I also
23 reviewed the entire transcript of my deposition to ensure the accuracy of the transcription.

24 11. On July 21 and 22, 2025, I testified during the two-week trial and was also cross-
25 examined, for a total of one hour, answering highly personal questions relating to menstruation
26 and pregnancies in front of the jury.

27 12. As the litigation progressed, I continued to engage with my attorneys and otherwise

1 assisted in representing the interests of the other Class Members throughout the settlement process.

2 13. based on the considerable time and effort I spent in protecting the Settlement
3 Classes' interests in this Action, I support this application for a service award of 25,000.

4 14. I have reviewed the Settlements and believe that the terms are fair, reasonable and
5 in the best interest of the Class Members.

6 15. I understand that Plaintiffs' Counsel have invested considerable time and effort
7 prosecuting this Action on my and the Settlement Classes' behalf. This includes advancing
8 hundreds of thousands of dollars in expenses and spending thousands of hours over years of hard-
9 fought litigation, with no guarantee of recovery or payment. I therefore support this application for
10 reimbursement of attorneys' fees and expenses in an amount approved by the Court that is fair and
11 reasonable and accounts for the uncertainty of the recovery and the considerable time and effort
12 spent by Plaintiffs' Counsel in prosecuting this Action.

13 16. I remain ready, willing, and able to continue to represent the interests of the
14 Settlement Classes throughout the Settlement approval process.

15 ***

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

17
18 Executed this 19 day of August, 2026, at Santa Rosa, CA.

19
20 
21 Sarah Wellman Sarah Wellman

Christian Levis (*pro hac vice*)
LOWEY DANNENBERG, P.C.
 44 South Broadway, Suite 1100
 White Plains, NY 10601
 Tel: (914) 997-0500
 Fax: (914) 997-0035
 clevis@lowey.com

*Co-Lead Class Counsel for Plaintiffs
 and the Class*

Carol C. Villegas (*pro hac vice*)
LABATON KELLER SUCHAROW LLP
 140 Broadway
 New York, NY 10005
 Tel.: (212) 907-0700
 Fax: (212) 818-0477
 cvillegas@labaton.com

*Co-Lead Class Counsel for Plaintiffs
 and the Class*

Diana J. Zinser (*pro hac vice*)
SPECTOR CALDES & CORRIGAN, PC
 2001 Market Street, Suite 3420
 Philadelphia, PA 19103
 Tel: (215) 496-0300
 Fax: (215) 496-6611
 dzinser@scc.law

*Co-Lead Class Counsel for Plaintiffs
 and the Class*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

ERICA FRASCO, et al., individually and on
 behalf of all others similarly situated,

Plaintiffs,

v.

FLO HEALTH INC., META PLATFORMS,
 INC., GOOGLE, LLC, and FLURRY, LLC,

Defendants

Case No. 3:21-cv-00757-JD

**DECLARATION OF TESSA GAMINO
 IN SUPPORT OF CLASS COUNSEL'S
 MOTION FOR AWARD OF
 ATTORNEYS' FEES AND EXPENSES,
 AND PLAINTIFFS' APPLICATION
 FOR SERVICE AWARD**

1 I, Tesha Gamino, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as
2 follows:

3 1. I am one of the Named Plaintiffs and Class Representatives in this Action. I am
4 a resident of the state of California, and have been a resident of the state of California my entire
5 life. I respectfully submit this Declaration in support of: (a) the Class Counsel's Motion for
6 Attorneys' Fees and Expenses and Plaintiffs' Application for Service Awards, filed herewith;
7 and (b) Plaintiffs' Motion for Final Approval. I have personal knowledge of all the facts stated
8 herein, and if called to testify as a witness, I could and would competently testify to them.

9 2. Unless otherwise defined, capitalized terms herein have the same meaning as
10 in the Settlement Agreements between Plaintiffs and Flurry LLC ("Flurry"), Google LLC
11 ("Google"), and Flo Health, Inc. ("Flo"). *See* ECF Nos. 589-2, 820-2, 820-3.

12 3. On February 2, 2021, I filed a Complaint in this Action (originally filed in the
13 Central District of California as Case No. 5:21-cv-00198) and chose to serve as a class
14 representative because I believe that privacy is an important right and Defendants' alleged
15 surreptitious collection, storage, and dissemination of my intimate and personal health
16 information violated my privacy.

17 4. I am not aware of any conflict of interest that I could have with any other Class
18 Member, and I am willing and able to continue as a Class Representative.

19 5. I retained attorneys experienced in consumer protection and data privacy class
20 action litigation to represent me in this matter. At the outset of the case, I was informed of and
21 understood my duties as a class representative, and believe that I have fulfilled these duties.

22 6. At all times during this litigation, I have endeavored to fully discharge my
23 obligations as a Class Representative. To that end, I have: (1) routinely communicated with
24 Class Counsel, including Alexis M. Wood and as L. Gallucci, attorneys at Marron PC
25 concerning this Action; (2) remained fully informed about case developments; (3) routinely
26 reviewed the various pleadings filed in this Action; (4) searched for and produced documents,
27 providing full access to my personal email account; (5) responded to Defendants' document

1 requests and interrogatories; (6) prepared for and sat for a deposition; (7) testified on direct
2 and cross-examination during the trial against Flo and Meta; and (8) conferred with my
3 attorneys to understand and approve the terms of the Settlements. I agreed to the terms set forth
4 in the Settlement Agreements, subject to the Court's approval.

5 7. Over the span of more than five years, I have faithfully and diligently discharged
6 my duties as a Class Representative, and I have worked closely with my attorneys to ensure the
7 efficient and effective prosecution of the Action. In doing so, I have expended valuable effort and
8 time. I had countless telephone calls and video conference calls with my attorneys Alexis M.
9 Wood and as L. Gallucci and exchanged numerous written correspondces with them.

10 8. For example, I extensively discussed with attorneys at Marron PC the personal and
11 sensitive nature of the privacy violations that I believe occurred and had conversations with Alexis
12 M. Wood and as L. Gallucci to understand the responsibilities that I would have as a
13 representative of the proposed classes. I reviewed the draft complaint and, when necessary,
14 provided edits to the allegations that related to my experience before the complaint was filed.
15 Throughout the litigation, I maintained contact with Alexis M. Wood and as L. Gallucci to stay
16 up to date regarding the progress of the litigation.

17 9. During the discovery phase of the litigation, I worked with Alexis M. Wood and
18 as L. Gallucci to provide written responses to Defendants' discovery requests and interrogatories.
19 I reviewed Defendants' Requests for Production of Documents ("RFPs") and conferred with my
20 attorneys to understand these RFPs. I spent several hours searching for and providing documents
21 to my attorneys, including provided full access to my email and social media, and ultimately
22 produced several documents responsive to the RFPs. I also reviewed Defendants' Interrogatories
23 and met with my attorneys to discuss and respond to these Interrogatories. I then reviewed the
24 draft responses to the Interrogatories to ensure the accuracy of the responses through the
25 verification process. I also reviewed and verified all amended and supplemental responses.

26 10. On December 8, 2022, I was deposed for approximately 10 hours and 26 minutes
27 (my deposition started at 9:18 a.m. and ended at 7:44 p.m.). In advance of the deposition, I met

1 with attorneys Alexis M. Wood and as L. Gallucci for several hours on various days and also
2 independently prepared to provide testimony. This preparation involved a substantial investment
3 of time and effort. I also reviewed the entire transcript of my deposition to ensure the accuracy of
4 the transcription.

5 11. I also flew up to San Francisco on two occasions to participate in trial proceedings.
6 I attended multiple full days of Court, including opening statements and closing arguments. On
7 July 22, 2025, I testified during the two-week trial and was also cross-examined by two attorneys,
8 for approximately one hour, answering highly personal questions relating to menstruation and
9 pregnancies in front of the jury.

10 12. As the litigation progressed, I continued to engage with my attorneys and otherwise
11 assisted in representing the interests of the other Class Members throughout the settlement process.

12 13. Based on the considerable time and effort I spent in protecting the Settlement
13 Classes' interests in this Action, I support this application for a service award of \$25,000.

14 14. I have reviewed the Settlements and believe that the terms are fair, reasonable and
15 in the best interest of the Class Members.

16 15. I understand that Plaintiffs' Counsel have invested considerable time and effort
17 prosecuting this Action on my and the Settlement Classes' behalf. This includes advancing
18 hundreds of thousands of dollars in expenses and spending thousands of hours over years of hard-
19 fought litigation, with no guarantee of recovery or payment. I therefore support this application for
20 reimbursement of attorneys' fees and expenses in an amount approved by the Court that is fair and
21 reasonable and accounts for the uncertainty of the recovery and the considerable time and effort
22 spent by Plaintiffs' Counsel in prosecuting this Action.

23 16. I remain ready, willing, and able to continue to represent the interests of the
24 Settlement Classes throughout the Settlement approval process.

25 ***
26
27

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

2
3 Executed this 20th day of August 2026, at Ontario, California.

4 DocuSigned by:
5 
6 74FA6B098D394B7...
7 Tesha Gamino