



v. *Penn Treaty* in the Fifth Judicial Circuit of Florida for Marion County, Case No. 03-65-CA-G. In the *Forest* case, the Circuit Court relied upon my opinion in awarding class counsel \$2.7 million in attorneys' fees and costs.

4. Beginning in 2003, I spent three years representing major corporations in complex litigation, including the defense of class actions and mass torts. Beginning in 1996, I spent six years litigating state and nationwide consumer class actions at the law firm of James, Hoyer, Newcomer & Smiljanich. During that time, I represented Plaintiff as class counsel in the following actions, among others: *Hirsh, et al. v. Physicians Mutual, et al.*, S.D. Miss, Case No. 2:00-cv-0039; *Grove v. Principal Mutual Life Ins. Co.*, S.D. Iowa, Case No. 4:97-cv-90224; *Duhaime v. John Hancock Mutual Life Ins. Co.*, D. Mass, Case No. 96-cv-10706; *In re Baycol Products Litigation*, D. Minn, Case No. MDL 1431; *Parkhill v. Minnesota Mutual Life Ins. Co.*, D. Minn., Case No. 97-cv-515; *Force, et al. v. ITT Hartford Life & Annuity Co.*, D. Minn., Case No. 97-cv-1619; *In re General American Sales Practices Litigation*, E.D. Mo., Case No. 01-cv-1453; *Cunningham v. PFL Life Ins. Co.*, M.D. Iowa, Case No. 98-cv-0067; and, *Thompson v. MetLife*, S.D.N.Y., Case No. 00-cv-5071.

5. I am the author of the following articles:

*What Erin Brockovich Failed to Tell You About the Realities of Class Action Litigation*, ADR & The Law, 19th Ed., 2002, Fordham Int'l Law Journal, Vol. 26;

*Private Causes of Action for Pollution Damages Pursuant to Section 376.313, Florida Statutes*, The Lawyer, February 2003; and,

*EPA Issues Guidelines and Seeks Information in Response to Supreme Court Ruling*, The Lawyer, March 2003.

6. I have been involved in the litigation of this matter from its inception as co-counsel with the law firm of Morgan & Morgan. I participated in the analysis of Plaintiff's claims,

conducted legal research, and drafted the class action complaint. After this action was filed, I was admitted to practice before this Court *pro hac vice*, and have continued to participate in the litigation.

7. During the pendency of this action, I secured the testifying experts on behalf of the Class, and worked with them in analyzing the electronic data produced by the Defendant, which led to the identification of the class members in this action. I participated in the drafting of discovery requests and conducted a review of the documents produced as well as the answers to interrogatories and requests for admission. I participated in drafting follow-up discovery requests, and conducted legal research regarding the causes of actions asserted and defenses raised during these proceedings. I have also conducted legal research regarding the various evidentiary issues that have arisen during the litigation.

8. On behalf of the Class, I appeared before this Court at the initial case management conference and at numerous telephonic hearings for the purpose of making applications to the Court for various relief and in advance of filing motions related to discovery. I participated in the drafting of the initial motion for class certification and the brief in support. I prepared the declaration and supporting documents in support of Plaintiff's initial motion for class certification. I have continued to act as co-counsel along with Morgan & Morgan throughout the pendency of this action for a period of almost three years.

21. This declaration is being submitted in support of the attorneys' fees and costs incurred by my firm and my co-counsel in the representation of Plaintiff and the Class since the inception of this case.

22. The following is a compilation of the time incurred by my firm on behalf of Plaintiff and the Class, as reflected by the contemporaneous time and expense records on file:

<b>Attorney</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Geoffrey E. Parmer	184.30	\$400.00	\$ 73,720.00
		Lodestar:	\$ 73,720.00

23. The hourly rate listed above is my current hourly rate regularly charged by my firm for contingent matters as well as for complex non-contingent matters. I believe my rate is reasonable and within the range of lawyers with similar levels of experience and class action expertise.

24. In addition to the time expended, my firm also incurred \$644.20 in expenses which were reasonably and necessarily committed to the prosecution of the litigation. These expenses are broken down as follows:

<b>Expense Category</b>	<b>Total</b>
Travel	\$ 644.20
Total Expenses:	\$ 644.20

25. The above expenses pertaining to this case are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, checks, records and other documents and are an accurate record of the expenses.

26. I assert that the attorneys' fees and costs sought herein are reasonable and seek fair and reasonable compensation for undertaking this case on a contingency basis, and for obtaining the very substantial relief for Plaintiff and the Class.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true

and correct. Executed this 13<sup>th</sup> day of May, 2015 in Tampa, Florida.

A handwritten signature in black ink, appearing to read "G. E. Parmer". The signature is written in a cursive style with a large, stylized initial "G".

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Geoffrey E. Parmer