



resolved, the pending case of *Cronas, et al. v. Willis Group Holdings, Ltd., et al.* was filed. I began assisting lead counsel for *Cronas* with their litigation in January 2008, sharing *Hnot* work product with them and discussing strategy. This work accounts for less than 25 hours of the total lodestar request below. I agreed to take on a more active role in the case in January 2010, and entered my appearance shortly thereafter.

3. This Declaration is submitted in support of the plaintiffs request for an award of attorneys' fees and expenses for work done in this matter through May 6, 2011.

4. With respect to my background, relevant qualification and experience, as well as those of other attorneys who worked on this matter, I attach biographies hereto as Exhibit A.

5. The lodestar calculation is made based upon 2010 billing rates.

<b>NAME</b>	<b>POSITION</b>	<b>RATE</b>	<b>HOURS</b>	<b>TOTAL</b>
Christine E Webber	partner	\$625	574.5	\$359,062.50
Joseph M. Sellers	partner	\$740	7.75	\$5,735.00
Abigail Shafroth	associate	\$325	50.2	\$16,315.00
Christopher Scherman	paralegal	\$185	36.25	\$6,891.25
<b>TOTAL</b>				<b>\$388,003.75</b>

6. In our application for attorneys' fees, we excluded from the lodestar calculation some hours billed by paralegal Chris Scherman that included activities which could have been completed by clerical staff, and paralegal assistance provided by others when Mr. Scherman was unavailable. These reductions were based on a line by line, item by item review of our time records. I believe, with those reductions, that the remaining time was reasonably and necessarily expended in the prosecution of this action.

7. The hourly rates set forth on this chart are consistent with the usual and customary hourly rates for the Firm's work performed for non-contingency fee clients as of

2011. Our Firm's hourly rates have been paid by hourly clients and, separately, approved for payment by federal and state courts in other class action litigation.

8. Cohen Milstein's compensation for the services rendered in this case and reimbursement of expenses have been and are wholly contingent on the outcome.

9. Throughout this proceeding, we have endeavored to represent the interests of the plaintiffs in the fullest and most efficient way possible. The time summarized in this Declaration was actually expended, in the exercise of professional judgment, by me and the paralegal involved. We have avoided any unnecessary duplication of effort by coordinating carefully with lead counsel. The time for which Cohen Milstein claims compensation is described in paragraphs 10 and 11 and was reasonably and necessarily expended. The detailed daily time summaries, with some redactions to protect protected work product and attorney-client privilege, have been submitted for *in camera* review.

10. Throughout the time we worked on this matter, our timekeepers have been required to keep daily time-records, providing both amounts of time spent on discrete tasks and descriptions of that work. These records are entered into a computer database, checked, and maintained in computer-readable format.

11. I played a specific, discrete role in this litigation, designed to avoid any duplication of effort. Specifically, I (a) took the lead in working with our statistical expert and responding to the expert retained by Willis; (b) provided expertise and oversight to the class certification briefing, while lead counsel assigned more junior attorneys to take on more time consuming aspects of that task; (c) took several depositions of fact witnesses, splitting the witnesses with co-counsel. I deposed five lay witnesses, second chaired the deposition of one additional key lay witness, and deposed two expert witnesses. I also defended plaintiffs'

expert during his deposition. While I provided some background information and guidance on discovery of email, lead counsel assumed primary responsibility for paper discovery. I worked with the expert witness to ensure that he had all of the information he needed to develop his opinions and prepare his reports. I was also involved in preparing for and participating in settlement discussions, and took the lead for the plaintiffs in drafting the consent decree.

12. My firm's lodestar fee, based upon the rates identified above and time expended, after the deductions set forth above, is \$388,003.75.

13. My firm's lodestar figures are based upon the firm's billing rates, which rates do not include charges for expenses items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates. Paragraph 15 contains a summary of the costs reasonably incurred by Cohen Milstein during the same time period.


14. As detailed in paragraph 15, my firm has incurred a total of \$12,570.12 in expenses in connection with the prosecution of this litigation. The expenses incurred were reasonable and necessary under the circumstances of this litigation. The expenses incurred in this action are reflected on the books and records of this firm. These books and records are prepared from invoices, expense vouchers, and other source materials and are an accurate record of the expenses incurred. The underlying invoices and receipts are available for inspection if the Court requests.

15. The expenses incurred by our Firm can be divided into the following categories:

<b>Category</b>	<b>Amount</b>
in-house duplicating (6435 pages at \$0.20/page)	\$1287.00
long distance telephone	\$410.47

postage, overnight delivery	\$297.63
court fees (certificate for pro hac vice)	\$30.00
computer research	\$261.04
travel - transportation	\$4394.23
travel - hotel	\$3560.26
travel - taxis, parking	\$1060.00
travel - meals	\$495.03
administrative overtime (to open our NY office early for deposition)	\$252.18
overtime transportation	\$50.45
business meals (providing meals during depositions)	\$465.39
TOTAL	\$12,563.68

I declare under penalty of perjury under the laws of the District of Columbia and the State of New York that the foregoing is true and correct to the best of my knowledge and that this Declaration was prepared in the District of Columbia on October 30, 2011.

  
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 Christine E. Webber