

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Richmond Division)

JEROME SKOCHIN, SUSAN SKOCHIN and) Civil Action No. 3:19-cv-00049-REP
LARRY HUBER, Individually and on Behalf)
of All Others Similarly Situated,) CLASS ACTION
)
Plaintiffs,)
)
vs.)
)
GENWORTH LIFE INSURANCE)
COMPANY and GENWORTH LIFE)
INSURANCE COMPANY OF NEW YORK,)
)
Defendants.)
)
_____)

**CLASS COUNSEL'S SUPPLEMENTAL MEMORANDUM PURSUANT
TO THE COURT'S JULY 20, 2020 ORDER**

TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. ARGUMENT	1
A. Class Counsel’s Lodestar Reflects the Time, Labor, and Skill Reasonably Required to Prosecute This Action	1
B. Class Counsel’s Hourly Rates Are Reasonable	4
1. Recent Federal Court Decisions Approving Robbins Geller’s Hourly Rates	6
2. Recent Federal Court Decisions Approving Berger Montague’s Hourly Rates	7
3. Recent Federal Court Decisions Approving Brian D. Penny’s Hourly Rate.....	8
4. Class Counsel’s Hourly Rates Are Reasonable Compared to Other Benchmarks.....	9
C. The Hourly Rates for Each Attorney Who Worked on This Case for the Class’ Benefit Are Justified	11
1. Brian D. Penny of Goldman Scarlato & Penny	11
2. Robbins Geller Attorneys	12
3. Berger Montague Attorneys.....	15
D. One Final Point on Class Counsel’s Fee Application.....	17
E. The Class’ Representation by Four Law Firms Was Necessary and Did Not Materially Increase Any Costs.....	18

TABLE OF AUTHORITIES

CASES	PAGE
<i>Allen v. Realcomp II, Ltd</i> , No. 10-cv-14046 (E.D. Mich.).....	8, 12
<i>Berry v. Schulman</i> , 807 F.3d 600 (4th Cir. 2015)	17
<i>Boland v. Cons. Multiple Listing Serv.</i> , No. 3:09-cv-1335 (D.S.C.).....	8
<i>Devlin v. Ferrandino & Son, Inc.</i> , No. 15-4976, 2016 WL 7178338 (E.D. Pa. Dec. 9, 2016).....	8
<i>Foti v. NCO Fin. Sys., Inc.</i> , No. 04 Civ. 00707 (RJS), 2008 U.S. Dist. LEXIS 16511 (S.D.N.Y. Feb. 20, 2008)	17
<i>Hensley v. Eckerhart</i> , 461 U.S. 424 (1983).....	17
<i>Hickman v. TL Transp., LLC</i> , No. 17-cv-1039 (E.D. Pa. Feb. 18, 2020)	7
<i>In re Domestic Drywall Antitrust Litig.</i> , No. 13-md-2437, 2018 WL 3439454 (E.D. Pa. July 17, 2018)	8
<i>In re Genworth Fin. Sec. Litig.</i> , No. 1:14-cv-02392 (AKH) (S.D.N.Y.)	6
<i>In re Intelsat S.A.</i> , No. 20-32299-KLP (Bankr. E.D. Va. June 9, 2020).....	9
<i>In re MicroStrategy, Inc. Sec. Litig.</i> , 172 F. Supp. 2d 778 (E.D. Va. 2001)	7
<i>In re Prudential Ins. Co. of Am. Sales Practice Litig.</i> , 106 F. Supp. 2d 721 (D.N.J. 2000)	18
<i>Knurr v. Orbital ATK, Inc.</i> , No. 1:16-cv-01031-TSE-MSN, 2019 WL 3317976 (E.D. Va. June 7, 2019)	6
<i>Logue v. West Penn Multi-List Inc.</i> , No. 2:10-cv-000045 (W.D. Pa.).....	8
<i>McBean v. City of New York</i> , 233 F.R.D. 377 (S.D.N.Y. 2006)	17
<i>Mirakay v. Dakota Growers Pasta Co.</i> , No. 13-cv-04429 (D.N.J.)	8

PAGE

Missouri v. Jenkins by Agyei,
491 U.S. 274 (1989).....5

Phillips v. Triad Guar. Inc.,
No. 1:09CV71, 2016 WL 2636289 (M.D.N.C. May 9, 2016).....7

Robertson v. Sea Pines Real Estate Co.,
No. 9:10-cv-00095 (D.S.C.).....8

Rossi v. Proctor & Gamble Co.,
No. CIV.A. 11-7238 JLL, 2013 WL 5523098 (D.N.J. Oct. 3, 2013)17

Rum Creek Coal Sales, Inc. v. Caperton,
31 F.3d 169 (4th Cir. 1994)5

Scolaro v. RightSourcing, Inc.,
No. 8:16-cv-01083 (C.D. Cal. June 26, 2017)8

Shaw v. AMN Servs., LLC,
No. 3:16-cv-02816 (N.D. Cal. May 31, 2019).....8

Silver v. Fitness Intern., LLC,
No. 10-cv-2326-MMB, 2013 WL 5429293 (E.D. Pa. Sept. 27, 2013).....16

Woburn Ret. Sys. v. Salix Pharms., Ltd.,
No. 1:14-CV-08925-KMW, 2017 WL 3579892 (S.D.N.Y. Aug. 18, 2017)7

Yamonouchi Pharm. Co. v. Danbury Pharmacal., Inc.,
51 F. Supp. 2d 302 (S.D.N.Y. 1999).....9

Yurman Designs, Inc. v. PAJ, Inc.,
125 F. Supp. 2d 54 (S.D.N.Y. 2000), *aff'd*, 29 F. App'x 46 (2d Cir. 2002).....9

SECONDARY AUTHORITIES

Josh Saul, et al., *PG&E Pays a Million a Day for America’s Biggest Utility Bust*,
BLOOMBERG (Sept. 5, 2019)9

Legal Billing Report, THOMPSON REUTERS (May 2018)9

Sara Randazzo, et al., *Legal Fees Cross New Mark: \$1,500 an Hour*,
WALL ST. J. (Feb. 16, 2016).....10

Goldman Scarlato & Penny, P.C. (“Goldman Scarlato & Penny”), Robbins Geller Rudman & Dowd LLP (“Robbins Geller”), Phelan Petty PLC (“Phelan Petty”), and Berger Montague PC (“Berger Montague”), counsel for the Named Plaintiffs and the Settlement Class (“Class Counsel”) respectfully submit this supplemental memorandum pursuant to the Court’s July 20, 2020 Order (ECF No. 198).

I. INTRODUCTION

The time Class Counsel spent litigating and settling this case, which Class Counsel performed about as efficiently and professionally as one could imagine, was reasonable. So, too, are the hourly rates Class Counsel charged in this case. Those rates are reasonable compared to prevailing market rates of other plaintiffs’ firms of similar caliber and the nation’s top defense firms, against whom Class Counsel litigate some of the largest and most complex class action lawsuits on a daily basis, including this case. In addition, district courts across the nation, including in this Circuit, have approved Class Counsel’s rates as reasonable. Class Counsel herein respond to the Court’s July 20, 2020 Order and, for the reasons that follow, respectfully request that their Motion for an Award of Attorneys’ Fees and Expenses and Service Awards to the Named Plaintiffs (ECF No. 143), be granted.

II. ARGUMENT

A. Class Counsel’s Lodestar Reflects the Time, Labor, and Skill Reasonably Required to Prosecute This Action

The Court’s July 20, 2020 Order at ¶¶2(a) & (b) orders Plaintiffs’ Counsel to provide a list of time by category and the dollar amount of fees for each category. Attached as Exhibit A to the Supplemental Declaration of Brian D. Penny in Further Support of Class Counsel’s Application for an Award of Attorneys’ Fees and Expenses and Service Awards to the Named Plaintiffs

(“Penny Supp. Decl.”), is a chart with the total time by each law firm by category and the dollar amount of fees by category through July 21, 2020.¹

Class Counsel have already attested that they reasonably expended “nearly 5,500” total combined hours litigating this action. ECF No. 143 at 16-18 (citing declarations of counsel). Since filing their declarations in support of their fee and expense application on May 25, 2020, Class Counsel have expended over 650 additional hours in connection with Settlement-related proceedings, including hundreds of hours communicating with Class members regarding the Settlement. *See* Penny Supp. Decl., ¶4. These hours are sure to increase, as several objectors have indicated that they intend to appeal any final judgment this Court enters approving the proposed settlement. Moreover, Class Counsel has responded to nearly 5,000 phone calls from Class Members to date. Class Counsel expects to stay actively involved with the Class throughout the execution of this Settlement, which will likely result in thousands of additional inquiries from Class members as they receive their Special Election Letters. There is much work that Class Counsel will do in the future that is not reflected in their current lodestar.

Consistent with the Court’s July 20, 2020 Order, and for the Court’s reference, Class Counsel have broken down the time spent litigating and settling this case from inception through June 30, 2020, according to the following categories:

- **Complaints** – includes time spent researching the legal claims that could be brought, as well as substantial research into: (i) the long-term care industry and its history with rate actions; (ii) rate action filings of Genworth Life Insurance Company and Genworth Life Insurance Company of New York (collectively, “Genworth”) and several of its competitors in more than 20 states over a ten-year period; (iii) Genworth’s financial statements filed with the United States Securities and Exchange Commission from 2008-

¹ The Court’s July 20, 2020 Order requested Class Counsel to list their total time by category, including time “preparing briefs (by Motion)[.]” ECF No. 198 at 2, ¶(2)(a). Because this time includes time spent drafting Plaintiffs’ reply in support of final approval and all supplemental briefing this Court requested, all of which post-date Class Counsel’s fee declarations filed on May 25, 2020, Class Counsel’s time chart includes such additional time.

2019; and (iv) annual financial statements filed by Genworth with the Delaware Department of Insurance over the same time period. This category includes the time spent drafting the initial complaint, as well as the First, Second and Third Amended Complaints.

- **Motion to Dismiss** – includes legal research and drafting responsive briefs to Genworth’s first Motion to Dismiss the Complaint filed March 12, 2019, and the Motion to Dismiss the Second Amended Complaint filed May 13, 2019.
- **Class Certification Motion** – includes legal research and extensive factual investigation of the documents produced in discovery and the deposition testimony elicited from key Genworth personnel and its expert witness. This brief was file ready on the eve of mediation.
- **Motion to Notice Class (Preliminary Approval Motion)** – includes the legal research and preparation of the preliminary approval motion, but does not include preparation of the Settlement Agreement and related exhibits that accompanied the motion. Those latter tasks are captured in the “Settlement” category.
- **Motion for Final Approval** – includes the legal research and factual investigation required to draft this motion.
- **Motion for Attorneys’ Fees** – includes the legal research and factual investigation required to draft this motion.
- **Reply Brief in Support of Final Approval and Fee Award** – includes the legal research and factual investigation required to draft this brief. It also includes reviewing, analyzing, and responding each of the objections that were filed to the Settlement.
- **Indiana Department of Insurance Motion** – includes the legal research for and drafting of Plaintiffs’ response in opposition to the Department’s motion to stay settlement proceedings, as well as Class Counsel’s meet-and-confer with the Department on that motion.
- **Depositions** – includes the time reviewing documents produced in the litigation and preparing for the depositions of Genworth’s Senior Project Leader for In-Force Management and Genworth’s Vice President for LTC Insurance Project Management. It also includes the work preparing each of the Named Plaintiffs for their depositions and defending those depositions.
- **Court Appearances** – includes the work involved in preparing for the Initial Pre-Trial Conference, the Motion to Dismiss arguments, the telephonic hearing on Genworth’s request for financial and medical information of the Named Plaintiffs, the preliminary approval hearing, the telephonic hearing on the Indiana Department of Insurance’s motion to stay,

and the final approval hearings. It also includes the travel to and from some of these hearings as well as the hearings themselves.

- **Discovery Requests** – includes the time creating Plaintiffs’ document requests, interrogatories and requests for admission, meeting and conferring on those requests, and negotiating the protective order and ESI protocol. It also includes the time spent responding to Genworth’s discovery requests, including the client communications necessary to that task.
- **Document Review** – includes the time spent reviewing more than 200,000 pages of documents produced by Genworth, as well as time spent creating document review memoranda, creating the coding platform, training the attorneys’ coding those documents, quality control of the review, and second level review of “hot docs” identified in the coding process.
- **Settlement** – includes the time spent creating the settlement demand letters, retaining a mediator, drafting submissions and statements requested by the mediator, preparing for each mediation session, conducting the mediation sessions themselves, follow-up discussions with the mediator and Genworth, drafting and/or editing the Memorandum of Understanding, the Settlement Agreement and its exhibits. It also includes the negotiation, drafting and editing of the Amendment to the Settlement Agreement and its exhibits.
- **Class Member Communications** – includes communications with nearly 5,000 Class members that called or emailed Class Counsel directly with questions or comments about the Settlement through July 21, 2020. It also includes communications with Named Plaintiffs throughout this litigation that are not already captured in the “Deposition” or “Discovery Requests” categories.
- **Litigation Strategy** – includes communications between Class Counsel throughout the litigation about strategy and tasks that are not already captured in other categories.
- **Experts** – includes Class Counsel’s communications with potential experts that might be needed at trial. It also includes the time spent preparing for, traveling to, and deposing Genworth’s expert, Ted Nickel, the past president of the National Association of Insurance Commissioners and the Wisconsin Commissioner of Insurance from 2011-2019.

B. Class Counsel’s Hourly Rates Are Reasonable

The Court’s July 20, 2020 Order further provides that Counsel shall “[e]xplain why, in calculating the lodestar fee, any hourly rate greater than \$500 per hour is warranted for each lawyer whose time is listed at that rate[.]” ECF No. 198 at 2-3. Respectfully, Class Counsel submit that

their customary hourly rates charged for this case, including the rates for certain attorneys greater than \$500 per hour, are reasonable and should be approved.

An “attorney’s actual billing rate provides a starting point for purposes of establishing a prevailing market rate.” *Rum Creek Coal Sales, Inc. v. Caperton*, 31 F.3d 169, 175 (4th Cir. 1994);² *see also Missouri v. Jenkins by Agyei*, 491 U.S. 274, 283-84 (1989) (approving the use of current hourly rates to calculate the base lodestar figure as a means of compensating for the delay in receiving payment that is inherent in class actions, inflationary losses, and the loss of access to legal and monetary capital that could otherwise have been employed had class counsel been paid on a current basis during the pendency of the litigation).

Here, Class Counsel include some the nation’s leading class action practitioners and one of this area’s leading plaintiff litigation firms.³ The attorneys’ regular billing rates are based on the customary rates that each firm typically charges either it’s paying clients,⁴ or have been approved by federal courts around the nation, including in the Fourth Circuit.

² Citations, internal quotations, and footnotes omitted and emphasis added unless otherwise noted.

³ *See* Declaration of Brian D. Penny Filed on behalf of Goldman Scarlato & Penny, P.C. in Support of Application for Award of Attorneys’ Fees and Expenses (ECF No. 144) (“Penny Fee Decl.”), Ex. F; Declaration of Stuart A. Davidson Filed on Behalf of Robbins Geller Rudman & Dowd LLP in Support of Application for Award of Attorneys’ Fees and Expenses (ECF No. 145) (“Davidson Fee Decl.”), Ex. E; Declaration of Glen L. Abramson Filed on Behalf of Berger Montague PC in Support of Application for Award of Attorneys’ Fees and Expenses (ECF No. 147) (“Abramson Fee Decl.”), Ex. C; Declaration of Jonathan M. Petty Filed on Behalf of Phelan Petty PLC in Support of Application for Award of Attorneys’ Fees and Expenses (ECF No. 146) (“Petty Fee Decl.”), Ex. F.

⁴ Penny Fee Decl., ¶4; Davidson Fee Decl., ¶4; Abramson Fee Decl., ¶4; Petty Fee Decl., ¶4.

1. Recent Federal Court Decisions Approving Robbins Geller's Hourly Rates

Recently, in *Kaess v. Deutsche Bank AG*, No. 09-cv-01714 (GHW) (RWL) (S.D.N.Y.), Judge Woods awarded Robbins Geller and its co-counsel attorneys' fees in connection with a proposed \$18.5 million settlement. *Id.*, ECF No. 330. During the final approving hearing, Judge Woods reviewed Robbins Geller's hourly rates and stated, "I find that these billable rates based on the timekeeper's title, specific years of experience, and market rates for similar professionals in their fields nationwide and in New York, where Robbins Geller LLP is based, to be reasonable in this context." *Id.*, June 11, 2020 Hearing Transcript ("Hr'g Tr.") at 25:12-16, Penny Suppl. Decl., Ex. B.

In *Knurr v. Orbital ATK, Inc.*, No. 1:16-cv-01031-TSE-MSN, 2019 WL 3317976 (E.D. Va. June 7, 2019), Judge Ellis found Robbins Geller and its co-counsel's attorneys' fee request fair and reasonable in connection with a securities class action settlement. *Id.* at *1. While Judge Ellis awarded a percentage of the settlement fund as a fee, Robbins Geller and its co-counsel submitted their hourly rates and lodestar calculations in further support of their fee request, with Robbins Geller's hourly rates ranging from \$400-\$600 for associates, \$730-\$950 for of counsel, \$780-\$1,250 for partners. *See Knurr v. Orbital ATK, Inc.*, No. 1:16-cv-01031-TSE-MSN (E.D. Va. Apr. 16, 2019), ECF No. 453, Ex. A. Judge Ellis did not question Robbins Geller's or its co-counsel's hourly rates.

In *In re Genworth Financial Securities Litigation*, No. 1:14-cv-02392 (AKH) (S.D.N.Y.), Judge Hellerstein awarded Robbins Geller and their co-counsel their requested fee award in connection with approval of a securities class action settlement. *Id.*, ECF No. 178. During the final approval hearing held on November 15, 2017, Judge Hellerstein specifically discussed the hourly rates charged by Robbins Geller and its co-counsel and concluded, "I don't find the rates – they're high, but I don't find them unreasonable, given what's going on in the market," and

“agree[d]” the firm’s rates were “actually below market.” *Id.*, November 15, 2017 Hr’g Tr., ECF No. 181, at 16:13-19.

On August 18, 2017, Judge Wood of the Southern District of New York issued an Opinion & Order that, among other things, granted final approval of a class settlement and awarded attorneys’ fees and expenses to plaintiffs’ counsel. *See Woburn Ret. Sys. v. Salix Pharms., Ltd.*, No. 1:14-CV-08925-KMW, 2017 WL 3579892 (S.D.N.Y. Aug. 18, 2017). In awarding fees amounting to a 3.14 multiplier to counsel’s collective lodestar, Judge Wood acknowledged Robbins Geller’s customary hourly rates for partners of “\$715 to \$980.” *Id.* at *5.

And, in May 2016, after performing a lodestar cross-check based on Robbins Geller’s and liaison counsel’s hours and customary billing rates (*i.e.*, “[t]he eight partners’ hourly rates ranged from \$640 to \$880 per hour [and] [t]he eight associates’ hourly rates ranged from \$375 to \$550 per hour”), Judge Tilley of the Middle District of North Carolina awarded Robbins Geller’s requested fees and expenses in connection with class action settlement. *Phillips v. Triad Guar. Inc.*, No. 1:09CV71, 2016 WL 2636289, at *7, *9 (M.D.N.C. May 9, 2016). Admittedly, the court also found that “[Robbins Geller’s] hourly rates are much higher than the hourly rates generally charged in this jurisdiction[,]” *but* concluded that “they are ‘within the range of reasonableness for PSLRA cases, where the market for class action attorneys is nationwide and populated by very experienced attorneys with excellent credentials.’” *Id.* at *7 (quoting *In re MicroStrategy, Inc. Sec. Litig.*, 172 F. Supp. 2d 778, 788 (E.D. Va. 2001)).

2. Recent Federal Court Decisions Approving Berger Montague’s Hourly Rates

Berger Montague’s hourly rates repeatedly have been approved as reasonable and appropriate in complex class action litigation throughout the country. *See, e.g., Hickman v. TL Transp., LLC*, No. 17-cv-1039 (E.D. Pa. Feb. 18, 2020) (“Although we’re doing a percentage, counsel has independently calculated the lodestar and used the lodestar as a point of reference for

the reasonableness of a percentage fee. And . . . I'd find both the hours worked and the rates charged were in themselves, reasonable. And were this a lodestar evaluation, I would not have a problem with that fee"); *Shaw v. AMN Servs., LLC*, No. 3:16-cv-02816 (N.D. Cal. May 31, 2019) (conducting lodestar cross check and holding, "[t]he Court further finds that the hourly rates of Class Counsel's co-counsel, Berger Montague PC, also are within the prevailing range of hourly rates charged by attorneys providing similar services."); *In re Domestic Drywall Antitrust Litig.*, No. 13-md-2437, 2018 WL 3439454, *20 (E.D. Pa. July 17, 2018) (holding that the hourly rates claimed by Berger Montague, among other firms, were "well within the range of rates charged by counsel in this district in complex cases"); *Scolaro v. RightSourcing, Inc.*, No. 8:16-cv-01083 (C.D. Cal. June 26, 2017) (approving Berger Montague's hourly rates); *Devlin v. Ferrandino & Son, Inc.*, No. 15-4976, 2016 WL 7178338, *10 (E.D. Pa. Dec. 9, 2016) ("[T]he hourly rates for Class Counsel [including Berger Montague] are well within the range of what is reasonable and appropriate in this market"). In addition to these explicit holdings that Berger Montague's customary rates are reasonable, dozens of other courts have implicitly found Berger Montague's rates as reasonable by approving class action attorneys' fees based on lodestar crosschecks of those hourly rates.

3. Recent Federal Court Decisions Approving Brian D. Penny's Hourly Rate

Mr. Penny was lead counsel in the following class action settlements: *Mirakay v. Dakota Growers Pasta Co.*, No. 13-cv-04429 (D.N.J.); *Allen v. Realcomp II, Ltd*, No. 10-cv-14046 (E.D. Mich.); *Robertson v. Sea Pines Real Estate Co.*, No. 9:10-cv-00095 (D.S.C.); *Logue v. West Penn Multi-List Inc.*, No. 2:10-cv-000045 (W.D. Pa.); and *Boland v. Cons. Multiple Listing Serv.*, No. 3:09-cv-1335 (D.S.C.). In each instance, Mr. Penny's fee request was approved in full and his hourly rates were not questioned or adjusted. He has also submitted fee requests in dozens of class action settlements in which he served as class counsel, often as a member of the plaintiffs'

executive committee. Again, in each instance his hourly rates were accepted as billed. In fact, Mr. Penny's hourly rate has never been adjusted or reduced by a court.

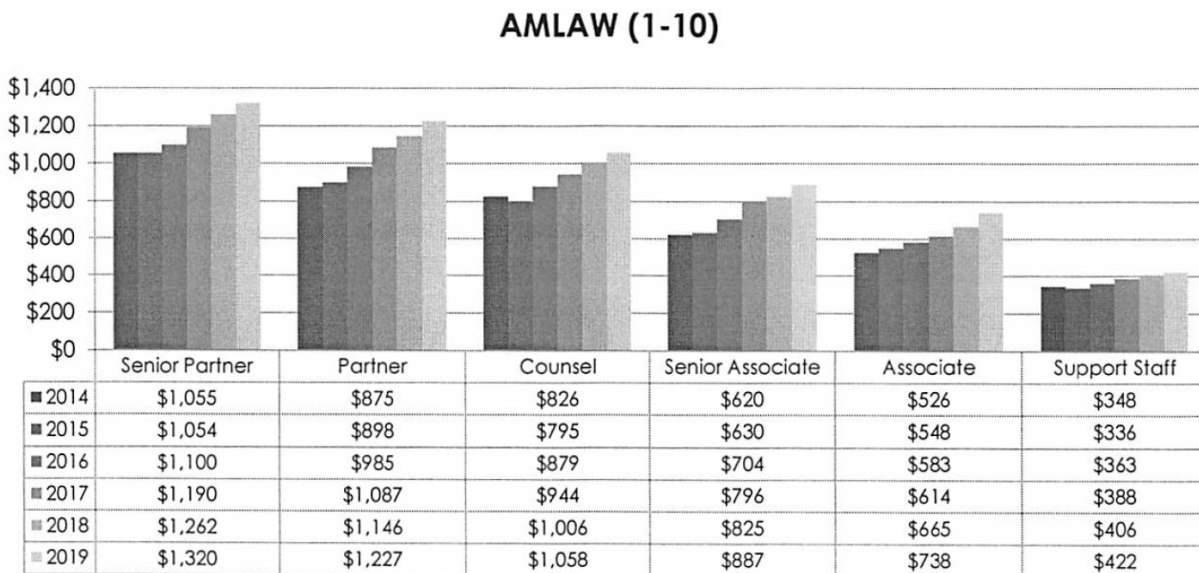
4. Class Counsel's Hourly Rates Are Reasonable Compared to Other Benchmarks

Class Counsel's hourly rates are not only well within the range of rates charged by attorneys with similar levels of experience and credentials, but are actually *lower* than the standard set by national defense firms that defend class actions as evidenced by, *inter alia*, *The National Law Journal's* survey of law firm billing rates in 2016. *See* Penny Supp. Decl., Ex. C (noting, among other things, that one law firm in Washington, D.C. four years ago billed some of its partners out at \$1,325 per hour);⁵ *see also* Application of Intelsat Connect Finance S.A. for Entry of an Order Authorizing the Employment and Retention of Willkie Farr & Gallagher LLP as Co-Counsel to the Special Committee of Intelsat Connect Finance S.A. Pursuant to Sections 327(e), 328(a), and 1107(b) of the Bankruptcy Code Effective as of May 13, 2020, *In re Intelsat S.A.*, No. 20-32299-KLP (Bankr. E.D. Va. June 9, 2020), ECF No. 311 at 6 (noting that Willkie Farr & Gallagher LLP "will bill at its standard hourly rates, which currently are: \$1,175 to \$1,700 for partners and counsel; \$390 to \$1,150 for associates, other attorneys, and law clerks; and \$265 to \$435 for paralegals."), Penny Supp. Decl., Ex. D; Josh Saul, et al., *PG&E Pays a Million a Day for America's Biggest Utility Bust*, BLOOMBERG (Sept. 5, 2019) (noting, "[o]f the more than 420 professionals listed in bills reviewed by Bloomberg, about 75 charged more than \$1,000 an hour. The highest rates were charged by nearly three dozen attorneys who billed between \$1,300 and \$1,600 an hour."), Penny Supp. Decl., Ex. E; *Legal Billing Report*, THOMPSON REUTERS (May 2018) (showing attorney hourly rates in District of Columbia Region, including \$1,395 for a

⁵ Courts rely on annual survey as evidence of prevailing hourly rates. *See, e.g., Yurman Designs, Inc. v. PAJ, Inc.*, 125 F. Supp. 2d 54, 58 (S.D.N.Y. 2000), *aff'd*, 29 F. App'x 46 (2d Cir. 2002); *Yamonouchi Pharm. Co. v. Danbury Pharmacal., Inc.*, 51 F. Supp. 2d 302, 305 (S.D.N.Y. 1999).

partner who graduated law school in 1998, \$1,015 for a partner who graduated law school in 2004, \$905 for an associate who graduated law school in 2013, and \$730 for an associate who graduated law school in 2016), Penny Supp. Decl., Ex. F.⁶

According to the *Valeo 2019 Attorney Hourly Rate Report*, attorney hourly rates in 2019 among the AmLaw 10 ranged from \$738-\$1,320:



Penny Supp. Decl., Ex. G.

Moreover, as explained in Class Counsel’s fee application (ECF No. 143 at 19), a comparison of Class Counsel’s hourly rates to the rates of both plaintiffs’ and defense counsel in other cases in this District demonstrates the reasonableness of Class Counsel’s rates for this case.

⁶ See also Sara Randazzo, et al., *Legal Fees Cross New Mark: \$1,500 an Hour*, WALL ST. J. (Feb. 16, 2016) (surveying class action attorneys’ fees filings and finding, “[f]or lawyers at the very top of th[e] fields [of high-stakes litigation and appeals], hourly rates can hit \$1,800 or even \$1,950” and citing a 2011 article and observing that the increases in hourly rates “mak[e] the \$1,000-an-hour legal fees that once seemed so steep look quaint by comparison”), <https://www.wsj.com/articles/legal-fees-reach-new-pinnacle-1-500-an-hour-1454960708> (last visited June 8, 2020).

	Genworth LTC Plaintiff Firm 2020 Rates	Sears Bankr. Defense Firm 2019 Rates	NCAA Antitrust Defense Firm 2018 Rates	Genworth Plaintiff Firm 2016 Rates	NII Holdings Plaintiff Firm 2016 Rates	Comp. Sciences Plaintiff Firm 2013 Rates
Partner	\$400-\$1,100	\$1,025-\$1,600	\$820-\$1,445	\$700-\$995	\$775-\$985	\$750-\$975
Associate	\$300-\$630	\$560-\$1,030	\$545-\$765	\$500	\$390-\$725	\$440-\$665
Counsel	\$775	\$1,025-\$1,160		\$700	\$650	\$725
Staff Attys	\$300-\$425	\$345-\$480	\$85	\$340-390	\$335-\$435	\$325-\$390
Paralegals	\$43-\$350	\$240-\$480	\$170-\$340	\$285-\$310	\$150-\$325	\$200-\$295
Investigators	\$290			\$245-\$495	\$425-\$495	\$410-\$485
Lit. Support	\$220		\$275	\$285		
Analysts				\$325	\$300-\$550	

C. The Hourly Rates for Each Attorney Who Worked on This Case for the Class’ Benefit Are Justified⁷

1. Brian D. Penny of Goldman Scarlato & Penny

Brian Penny is a founding Partner of Goldman Scarlato & Penny. He has been the lead litigator on this case since its inception. Mr. Penny has nearly 20 years of experience as a class action attorney representing plaintiffs, and has played leading roles in some of the largest securities fraud class actions, including *In re Broadcom Securities Litigation*, which resulted in a \$150 million recovery for the class, and *AOL Time Warner Securities Litigation*, which resulted in a recovery of over \$2.5 billion for investors. In addition to the cases cited above in which Mr. Penny was lead class counsel, he was also one of the lead attorneys in a number of ground breaking securities fraud class actions arising from stock option backdating, including: *In re Monster Worldwide, Inc. Sec. Litig.* (\$47.5 million recovery); *In re Mercury Interactive Sec. Litig.* (\$117.5 million recovery); *In re SafeNet, Inc. Sec. Litig.* (\$25 million recovery), *Ramsey v. MRV Commc’ns* (\$10 million recovery); and *In re Semtech Sec. Litig.* (\$20 million recovery). Mr. Penny recently served on the plaintiff’s executive committee in *In re NHL Players’ Concussion Injury Litigation* (D. Minn.) (alleging league failed to protect players from known risks of

⁷ Pursuant to the Court’s Order, Class Counsel only discuss in this section those attorneys whose hourly rates are greater than \$500. ECF No. 198 at 2-3.

concussions), and is actively involved in several important antitrust class actions, including *In re Epipen Mktg., Sales Practices & Antitrust Litig.*, No. 2:17-md-2785 (D. Kan.); *In re Disposable Contact Lenses Antitrust Litig.*, No. 15-md-2626 (M.D. Fla.); and the sprawling *In re Generic Pharms. Pricing Antitrust Litig.*, 16-md-2724 (E.D. Pa.). In 2015, Mr. Penny was one of four finalists for the American Antitrust Institute's Enforcement Award for Outstanding Antitrust Litigation Achievement by a Young Lawyer for his work on *Allen v. Realcomp Ltd.* Mr. Penny's hourly rate is \$705.

2. Robbins Geller Attorneys

a. Stuart A. Davidson

Stuart Davidson is a partner in Robbins Geller's Boca Raton, Florida office, and has been the principal attorney for the firm working on this case. Mr. Davidson granted *summa cum laude* from law school in 1996, and has been at Robbins Geller or its predecessor firms since 2001. Mr. Davidson is a distinguished consumer class action plaintiffs' lawyer. In his 24 years of practice, he has led or currently leads (with co-counsel) some of the nation's largest consumer class actions in recent years, including serving in leadership roles in, among others: *In re Facebook Biometric Info. Privacy Litig.*, No. 3:15-cv-03747-JD (N.D. Cal.) (\$650 million recovery pending approval, the **largest ever** privacy class action settlement in history); *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*, No. 5:16-md-02752-LHK (N.D. Cal.) (\$117.5 million recovery in case involving largest data breach in history); *In re Am. Med. Collection Agency, Inc. Customer Data Sec. Breach Litig.*, No. 2:19-md-02904-MCA-MAH (D.N.J.) (serving as co-lead counsel on behalf of over 10,000,000 LabCorp customers); *In re NHL Players' Concussion Injury Litig.*, No. 0:14-md-2551 (SRN/JSM) (D. Minn.) (co-lead counsel representing retired professional hockey players in highly publicized case); and *In re EpiPen (Epinephrine Injection, USP) Mktg., Sales Practices & Antitrust*

Litig., No. 2:17-md-02785-DDC-TJJ (D. Kan.) (achieved class certification in currently-pending multi-billion antitrust and RICO case). Mr. Davidson's currently hourly rate is \$970.

b. Theodore (Ted) Pintar

Ted Pintar graduated from law school in 1987, and is a partner in Robbins Geller's San Diego, California. Mr. Pintar currently focuses his practice on class action settlements and settlement administration. Mr. Pintar has participated in the successful prosecution and settlement of numerous class actions and derivative actions over his 33-year career. He was part of the litigation team in the *AOL Time Warner* state and federal court securities opt-out actions, which arose from the 2001 merger of America Online and Time Warner and resulted in a global settlement of \$618 million. Mr. Pintar was also on the trial team in *Knapp v. Gomez*, which resulted in a plaintiff's verdict. Mr. Pintar has successfully prosecuted several RICO cases involving the deceptive sale of deferred annuities, including cases against Allianz Life Insurance Company of North America (\$250 million), American Equity Investment Life Insurance Company (\$129 million), Midland National Life Insurance Company (\$80 million), and Fidelity & Guarantee Life Insurance Company (\$53 million), and has participated in the successful prosecution of numerous other insurance and consumer class actions, including: (i) actions against major life insurance companies such as Manufacturer's Life (\$555 million initial estimated settlement value) and Principal Mutual Life Insurance Company (\$380+ million) involving the deceptive sale of life insurance; (ii) actions against major homeowners insurance companies such as Allstate (\$50 million) and Prudential Property and Casualty Co. (\$7 million); (iii) actions against automobile insurance companies such as the Auto Club and GEICO; and (iv) actions against Columbia House (\$55 million) and BMG Direct, direct marketers of CDs and cassettes. Mr. Pintar's current hourly rate is \$1,100.

c. Christopher C. Gold

Christopher Gold graduated from law school in 2010, and is a partner in Robbins Geller's Boca Raton office. Mr. Gold's practice focuses on mass tort and class action litigation involving consumer fraud, privacy, and data breach issues, and securities fraud. Mr. Gold has played an active role in prosecuting several cases with Mr. Davidson, including *In re Yahoo! Inc. Customer Data Sec. Breach Litig.* and *In re Facebook Biometric Info. Privacy Litig.* Mr. Gold has been recognized as a Super Lawyer Rising Star for the past two years. Mr. Gold's current hourly rate is \$765.

d. Lea M. Bays

Lea Bays graduated *magna cum laude* from law school in 2007, and is of counsel to Robbins Geller, based out of the San Diego office. Ms. Bays' practice focuses on e-discovery best practices, including identification of relevant electronically stored information, data culling, predictive coding protocols, privilege and responsiveness reviews, as well as post-production discovery and trial preparation. A frequent guest speaker at seminars and symposia, Ms. Bays is a leader in shaping the broader dialogue among the bench and bar in e-discovery issues. Ms. Bays serves on the Steering Committee for the Sedona Conference Working Group 1, sits on the San Diego ESI Forum Steering Committee, is an Advisory Board Member of ASU-Arkfeld eDiscovery, Law and Technology Conference, is a Board member of both the National eDiscovery Leadership Institute and the Complex Litigation eDiscovery Forum, and has been named a Leading Lawyer by Chambers USA (2019 and 2020) and Chambers Global (2020) for eDiscovery. Ms. Bays' current hourly rate is \$775.

e. Alina Davis

Alina Davis is a senior associate in Robbins Geller's Boca Raton office. Ms. Davis graduated from law school in 1994, and has recently focused her career assisting with the

prosecution of numerous securities and consumer class actions, including: *In re Valeant Pharm. Int'l, Inc. Sec. Litig.*, No. 3:15-cv-07658 (D.N.J.) (final approval of \$1.2 billion settlement pending); *City of Lakeland Empls. Pension Plan v. Baxter Int'l Inc.*, No. 1:10-cv-06016 (N.D. Ill.) (\$42.5 million recovery); and *In re Volkswagen "Clean Diesel" Mktg., Sales Practices, & Prods. Liab. Litig.*, No. 3:15-md-02672-CRB-JSC (N.D. Cal.) (over \$10 billion recovery, the largest ever for a consumer class action). Ms. Davis' current hourly rate is \$630.

f. Ricardo Marengo

Ricardo Marengo was an associate at Robbins Geller until 2019. Mr. Marengo graduated from law school in 2014, and was instrumental in assisting the firm prosecute several large consumer class actions, including: *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*, No. 5:16-md-02752-LHK (N.D. Cal.); and *In re Nat'l Prescription Opiate Litig.*, No. 1:17-md-02804 (N.D. Ohio).

3. Berger Montague Attorneys

a. Glen L. Abramson

Glen Abramson is a Shareholder of Berger Montague with more than 15 years' experience representing consumers and investors in class actions and other complex litigation. Mr. Abramson concentrates his practice on complex consumer protection, product defects, and financial services litigation, and representing public and private institutional investors in securities fraud class actions and commercial litigation. He has served as co-lead counsel in numerous successful consumer protection and securities fraud class actions, including *Casey v. Citibank, N.A.*, No. 5:12-cv-00820 (N.D.N.Y.) (as co-lead counsel, obtained a settlement valued at \$110 million in this consolidated class action on behalf of nationwide classes of borrowers whose mortgage loans were serviced by Citibank or CitiMortgage and who were force-placed with hazard, flood or wind insurance); *In re Oppenheimer Rochester Funds Grp. Sec. Litig.*, No. 09-md-02063-JLK-KMT (D.

Colo.) (as co-lead counsel, represented shareholders in Oppenheimer municipal bond funds in connection with losses suffered during the financial crisis of 2008; the case settled in 2014 for \$89.5 million); *In re Tremont, Sec. Law, State Law, & Ins. Litig.*, No. 1:08-cv-11117-TPG (S.D.N.Y.) (Mr. Abramson represented insurance policyholders who lost money in connection with the Madoff Ponzi scheme. The combined cases were settled for more than \$100 million); *In re Mutual Fund Inv. Litig.*, No. 04-md-15861-CCB (D. Md.) (as co-lead counsel, Mr. Abramson represented shareholders of various mutual fund families who lost money as the result of market timing in mutual funds. Mr. Abramson was lead counsel for Scudder/Deutsche Bank mutual fund shareholders and helped orchestrate combined settlements of more than \$14 million). Mr. Abramson was the principal Berger Montague attorney working on the case. His current hourly rate is \$705.

b. Shanon J. Carson

Shanon Carson is a Managing Shareholder of Berger Montague. He Co-Chairs the Employment & Unpaid Wages, Consumer Protection, Defective Products, and Defective Drugs and Medical Devices Departments and is a member of the Firm's Commercial Litigation, Employee Benefits & ERISA, Environment & Public Health, Insurance Fraud, Predatory Lending and Borrowers' Rights, and Technology, Privacy & Data Breach Departments. Mr. Carson has been appointed as lead counsel in class actions throughout the country and has received honors and awards from numerous publications. In both 2015 and 2016, Mr. Carson was selected as one of the top 100 lawyers in Pennsylvania, as reported by Thomson Reuters. In 2018, Mr. Carson was named to the *Philadelphia Business Journal's* "2018 Best of the Bar: Philadelphia's Top Lawyers." His current hourly rate is \$830.

c. Eric Lechtzin

Eric Lechtzin is a former Shareholder in the firm's Securities, Consumer Protection, ERISA and Employment & Unpaid Wages Litigation practice groups. Among his successful representations in the area of consumer fraud is *Silver v. Fitness Intern., LLC*, No. 10-cv-2326-MMB, 2013 WL 5429293 (E.D. Pa. Sept. 27, 2013), a class action against a national health club chain that resulted in substantial changes of its cancellation policies and practices. Mr. Lechtzin is the Pennsylvania State Chair for the National Association of Consumer Advocates. His current hourly rate is \$680.⁸

D. One Final Point on Class Counsel's Fee Application

Finally, it is important to note that Genworth and its counsel have agreed to pay the fees requested by Class Counsel in this matter.⁹ As the Fourth Circuit held, "Federal Rule of Civil Procedure 23(h) permits 'the court [to] award reasonable attorney's fees . . . *that are authorized by . . . the parties' agreement.*'" *Berry v. Schulman*, 807 F.3d 600, 617 (4th Cir. 2015) (citing Fed. R. Civ. P. 23(h)); *see also Rossi v. Proctor & Gamble Co.*, No. CIV.A. 11-7238 JLL, 2013 WL 5523098, at *9 (D.N.J. Oct. 3, 2013) (reasoning that "money paid to the attorneys is entirely independent of money awarded to the class, the Court's fiduciary role in overseeing the award is greatly reduced, because there is no potential conflict of interest between attorneys and class members.") (citing *McBean v. City of New York*, 233 F.R.D. 377, 392 (S.D.N.Y. 2006)).

Indeed, because the fees Class Counsel seek will be paid by Genworth separate and apart from the benefits each Class member will obtain from the settlement, any reduction of fees by the

⁸ Mr. Lechtzin left Berger Montague in May 2020. He is currently a Partner at Edelson Lechtzin LLP.

⁹ The Supreme Court has held that an agreed-to fee is an ideal situation because "[a] request for attorney's fees should not result in a second major litigation. Ideally, of course, litigants will settle the amount of a fee." *Hensley v. Eckerhart*, 461 U.S. 424, 437 (1983).

Court will only inure to Genworth's benefit, not the Class. *See, e.g., Foti v. NCO Fin. Sys., Inc.*, No. 04 Civ. 00707 (RJS), 2008 U.S. Dist. LEXIS 16511, at *21 (S.D.N.Y. Feb. 20, 2008) (finding proposed amount of fees to be fair in case where class settlement was not a monetary common fund, and attorneys' fees were not to "come out of the pocket of class members"; the court noted that "were the Court to reduce the agreed-upon amount of attorneys' fees, the only beneficiary would be [defendant] – not the class"); *see also In re Prudential Ins. Co. of Am. Sales Practice Litig.*, 106 F. Supp. 2d 721, 732 (D.N.J. 2000) (awarding the negotiated fee and noting "[h]ere, by contrast, the fees and expenses that Class Counsel have sought and that Prudential has agreed to pay will be paid by Prudential in addition to the class recovery, and will not diminish it. If the Court were to reduce Class Counsel's fee, that would not confer a greater benefit on the class, but instead would benefit only Prudential.")

That aside, as explained above, Class Counsel's hourly rates are reasonable.

E. The Class' Representation by Four Law Firms Was Necessary and Did Not Materially Increase Any Costs

This Court asked Class Counsel to "explain[] why it was necessary for four law firms to represent the plaintiffs and the class." ECF No. 198 at 3. This litigation was complex and time consuming. It required substantial resources of law firms that are experienced in class action litigation. As the Court is aware, the parties litigated this case through discovery at impressive speed, which has become the laudable hallmark of this District.

Class Counsel knew from the outset that the litigation would be intense and a trial date loomed throughout the discovery process. Class Counsel also knew that Genworth was well financed and had retained two of the largest and most respected law firms in the country. Dentons US LLP is one of the largest law firms in the world, and the team they committed to defend Genworth had as much experience in long-term care insurance class action litigation as any firm

in the country. McGuire Woods is also well known to this Court, and its accolades and resources likely need no further enunciation here.

To match this litigation power, the Named Plaintiffs deserved and required equally skilled and formidable attorneys. Named Plaintiffs did their best to assemble a team that had the financial and legal resources to match their competition.

Goldman Scarlato & Penny and Robins Geller handled most of the litigation in this matter. Phelan Petty was retained to act as local counsel (which is required) and supported the litigation throughout. As the case approached the class-certification phase in September 2020, with a trial date set for April 2021, Class Counsel added the law firm of Berger Montague to help get their case trial-ready, anticipating further discovery and expert work would be required to achieve that goal. After the parties reached a Settlement, and Notice was disseminated to the Class, all four firms were needed to field Class member inquiries about the Settlement.

A review of the time submitted herewith demonstrates that the firms representing the Class did not duplicate work. In fact, considering the amount of work completed in a short amount of time, the hours dedicated to this case could have been much greater. In the end, the Class was well served by having a well-organized group of experienced class action attorneys representing them. The resources dedicated to this case were not excessive, but were necessary.

DATED: July 27, 2020

Respectfully submitted,

PHELAN PETTY PLC

/s/

MICHAEL G. PHELAN (VSB No. 29725)
JONATHAN M. PETTY (VSB No. 43100)
3315 West Broad Street
Richmond, VA 23230
Telephone: 804/980-7100
804/767-4601 (fax)
mphelan@phelanpetty.com
jpetty@phelanpetty.com

ROBBINS GELLER RUDMAN
& DOWD LLP
STUART A. DAVIDSON (*pro hac vice*)
CHRISTOPHER C. GOLD (*pro hac vice*)
BRADLEY BEALL (*pro hac vice*)
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)

GOLDMAN SCARLATO & PENNY, P.C.
BRIAN DOUGLAS PENNY
Eight Tower Bridge, Suite 1025
161 Washington Street
Conshohocken, PA 19428
Telephone: 484/342-0700
484/342-0701 (fax)
penny@lawgsp.com

BERGER MONTAGUE PC
SHANON J. CARSON
GLEN L. ABRAMSON
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: 215/875-3000
215/875-4604 (fax)
scarson@bm.net
gabramson@bm.net

Attorneys for Plaintiffs and Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2020, I filed the foregoing pleading or paper through the Court's CM/ECF system, which sent a notice of electronic filing to all registered users.

/s/

Jonathan M. Petty (VSB No. 43100)

PHELAN PETTY, PLC

3315 West Broad Street

Richmond, VA 23230

Telephone: 804/980-7100

804/767-4601 (fax)

jpetty@phelanpetty.com

Counsel for Plaintiffs

Yolanda Sherman

From: cmecf@vaed.uscourts.gov
Sent: Monday, July 27, 2020 11:27 AM
To: Courtmail@vaed.uscourts.gov
Subject: Activity in Case 3:19-cv-00049-REPVAED Skochin et al v. Genworth Life Insurance Company Memorandum in Support

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Eastern District of Virginia -

Notice of Electronic Filing

The following transaction was entered by Petty, Jonathan on 7/27/2020 at 11:26 AM EDT and filed on 7/27/2020

Case Name: Skochin et al v. Genworth Life Insurance Company
Case Number: [3:19-cv-00049-REP](#)
Filer: Larry Huber
Jerome Skochin
Susan Skochin

Document Number: [201](#)

Docket Text:

[Memorandum in Support re \[142\] MOTION for Attorney Fees Class Counsel's Motion for an Award of Attorneys' Fees and Expenses and Service Awards to the Named Plaintiffs Class Counsel's Supplemental Memorandum Pursuant to the Court's July 20 2020 Order filed by Larry Huber, Jerome Skochin, Susan Skochin. \(Petty, Jonathan\)](#)

3:19-cv-00049-REP Notice has been electronically mailed to:

Bart Andrew Karwath bart.karwath@btlaw.com

Bradley Mathew Beall bbeall@rgrdlaw.com

Brian Charles Riopelle briopelle@mcguirewoods.com

Brian Douglas Penny penny@lawgsp.com

Brian Emory Pumphrey bpumphrey@mcguirewoods.com

Brielle Marie Hunt bhunt@phelanpetty.com, e_file_fl@rgrdlaw.com, iwinder@phelanpetty.com, jdennis@rgrdlaw.com

Catharine Luo catharine.luo@dentons.com

Christopher Chagas Gold cgold@rgrdlaw.com

Drew William Marrocco drew.marrocco@dentons.com, audrey.rosenbaum@dentons.com, docket.general.lit.wdc@dentons.com, michael.duvall@dentons.com

Elizabeth Scott Turner eturner@ohaganmeyer.com, akuta@ohaganmeyer.com

Gary Meyerhoff gary.meyerhoff@dentons.com

Glen L. Abramson gabramson@bm.net

Heidi Siegmund hsiegmund@mcguirewoods.com, kwalker@mcguirewoods.com, mdylak@mcguirewoods.com, shiggins@mcguirewoods.com

Jeffrey A. Dailey jdailey@daileyllp.com

Jonathan Monroe Petty jpetty@phelanpetty.com, iwinder@phelanpetty.com, mphelan@phelanpetty.com, penny@lawgsp.com, s davidson@rgrdlaw.com

Leanna Marie Anderson leanna.anderson@dentons.com

Michael G. Phelan mphelan@phelanpetty.com, dgardner@phelanpetty.com

Michael Joseph Duvall michael.duvall@dentons.com

Reid Lawrence Ashinoff reid.ashinoff@dentons.com

Ricardo J Marengo rmarengo@rgrdlaw.com

Roscoe C. Howard , Jr Roscoe.Howard@btlaw.com, dfraze@btlaw.com, jwylie@btlaw.com

Ryan David Frei rfrei@mcguirewoods.com, dcarver@mcguirewoods.com

Shanon J Carson scarson@bm.net

Stuart Andrew Davidson sdavidson@rgrdlaw.com

Thomas Carter White carter.white@dentons.com

Thomas D. Luck tom dluck@aol.com

3:19-cv-00049-REP Notice has been delivered by other means to:

Alan E. Kurtz
2745 Webster Street
Apt. 11
San Francisco, CA 94123

Cheryl J. Runser
9204 Venetian Way
Henrico, VA 23229

David J. Frame
633 Radford Hill Lane
Richardson, TX 75081

Dean H. Woodard
7106 Donegal Drive
Onsted, MI 49265

Donna Wright
2320 Chasewood Drive
Downers Grove, IL 60515

Eric Rosenfeld
149 West 87th Street
New York, NY 10024

George W. Brehmer
9801 Club Place Lane
Carmel, CA 93923

Harriet K. Jacobs
612 Christian St.
#2
Philadelohia, PA 19147

James M. Heckmann
111 10th Street
Unit 406
Des Moines, IA 50309

Jeanne Brehmer
9801 Club Place Lane
Carmel, CA 93923

John W. Sweeney
1217 Sea Plume Way
Sarasota, FL 34242

Jon C. Richards
1031 Hamilton Avenue
Palo Alto, CA 94301

Judith Anne Franke
32082 Apple Ridge Run
Millsboro, DE 19966-5988

Karol Buckley
P. O. Box 1283
Mancos, CO 81328

Lana L. Olsson
5624 Brianna Lane
Bellvue, CO 80512

Larry Lee Johnson
2224 West Rattlesnake Drive
Meridian, ID 83648-4778

Marion Goldberg
23 Pinebrook Drive
Whiteplains, NY 10605

Mark Ostrich
321 Vinet Avenue
Jefferson, LA 70121

Mark Simon
2301 Havana Trail
The Villages, FL 32162

Mary V. Sweeney
1217 Sea Plume Way
Sarasota, FL 34242

Michael C. Keller
4265 Kirby Ave.
Cincinnati, OH 45223

Pamela F. Spitznagle
6201 West 98th Street
Bloomington, MN 55438

Pamela J. Simpson
8022 Fogleman Road
Oak Ridge, NC 27310

Patricia A. Mazzeo
1449 W. Bahia Court
Gilbert, AZ 85233

Paul B. Junius
2603 W. Lake Isle Drive
Mequon, WI 53092

Phyllis Simon
2310 Havana Trail
The Villages, FL 32162

Ralph C. Ferrara
2818 McGill Terrace, NW
Washington, DC 20008

Rian T. Keller
4265 Kirby Ave.
Cincinnati, OH 45223

Richard John Frome
32082 Apple Ridge Run
Millsboro, DE 19966-5988

Roberta Saville
637 Regency Drive
Pittsburgh, PA 15239

Ronald D. Simpson
8022 Fogleman Road
Oak Ridge, NC 27310

Ruth A. Woodard
7106 Donegal Drive
Onsted, MI 49265

Sanford B. Goldbert
23 Pinebrook Drive
Whiteplains, NY 10605

Saul H. Jacobs
612 Christian St.
#2
Philadelphia, PA 19147

Scott A. Mazzeo
1449 W. Bahia Court
Gilbert, AZ 85233

Shirley J. Baston
1091 Overlook Parkway
Apt. 913
Macon, GA 31210

Steven D. Gratz
4740 S. Ocean Blvd
Apt. 1602
Highland Beach, FL 33487

Thomas F. Spitznagle
6201 West 98th Street
Bloomington, MN 55438

William J. Van Dam, Jr
354 Heartland Drive
New Lenox, IL 60451

William M. Saville
637 Regency Drive
Pittsburgh, PA 15239

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1091796605 [Date=7/27/2020] [FileNumber=9473159-0
] [36014b99a35b0992812248eab996e9a7535a592642e25f321e4a310bb9248c033e9
8727c913764d9429b3babc907181270eb87a42eb46a0c092336d61d674c8b]]