

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF STEELE

THIRD JUDICIAL DISTRICT

<p>PAYSHENCE CARR, on behalf of herself individually and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>SOUTH COUNTRY HEALTH ALLIANCE, A JOINT POWERS BOARD,</p> <p style="text-align: center;">Defendant.</p>	<p style="text-align: right;">Court File No. 74-CV-21-632 Judge Karen R. Duncan</p> <p style="text-align: right;">Case Type: Breach of Contract; Minnesota Government Data Practices Act</p>
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**DECLARATION OF J. GERARD STRANCH, IV IN SUPPORT OF
MOTION FOR ATTORNEYS' FEES, EXPENSES, AND
CLASS REPRESENTATIVE SERVICE AWARD**

I, J. Gerard Stranch, IV, am over the age of eighteen years. I offer this declaration in my capacity as one of the attorneys for Class Representative, Payshence Carr (“Class Representative” or “Ms. Carr”), individually, and on behalf of all others similarly situated, in the above styled action, in support of the Motion for Attorneys’ Fees, Expenses, and Class Representative Service Award. I have personal knowledge of the facts recited in this declaration, and if called upon to testify to the truth of the statements below, I could and would do so:

1. I am a licensed attorney in private practice in the state of Tennessee. The law firm I work for is Stranch, Jennings & Garvey, PLLC, in the capacity of Managing Partner.

2. The Court has appointed me and my firm, Stranch, Jennings & Garvey, PLLC, as well as Cohen & Malad, LLP, The Johnson Firm, and Hellmuth & Johnson, PLLC as Class Counsel. Preliminary Approval Order, July 18, 2023, ¶ 3.

3. The firms comprising Class Counsel have reported expenses in prosecuting this action of \$8,348.43 as itemized below:

Date	Firm	Description	Amount
5/12/2021	Hellmuth & Johnson, PLLC	Filing fee; summons and complaint	\$390.00
5/12/2021	Hellmuth & Johnson, PLLC	Filing fee, Motion <i>Pro Hac Vice</i>	\$80.00
5/14/2021	Hellmuth & Johnson, PLLC	Metro Legal Services, Inc. - Service of process fees.	\$165.00
6/10/2021	Hellmuth & Johnson, PLLC	Wells Fargo - Court Administrator – Filing Fee: Motion PHV, Proposed Order re Motion PHV.	\$80.00
2/2/2022	Stranch, Jennings & Garvey, PLLC	JAMS, Mediation Deposit	\$6,767.18
2/7/2022	Stranch, Jennings & Garvey, PLLC	JAMS, Mediation non-refundable fee	\$475.00
3/7/2022	Cohen & Malad, LLP	Mediation, JAMS	\$475.00
6/16/2023	Hellmuth & Johnson, PLLC	Wells Fargo - Court Administrator – Filing Fee: Notice and Motion for Prelim Approval of Class Action Settlement, etc.	\$80.00
7/13/2023	Stranch, Jennings & Garvey, PLLC	Minnesota Board of Bar Examiners, <i>Pro Hac Vice</i> Filing Fee, J.G.S.	\$450.00
7/13/2023	Stranch, Jennings & Garvey, PLLC	Minnesota Board of Bar Examiners, <i>Pro Hac Vice</i> Filing Fee, A.E.M.	\$450.00
8/18/2023	Hellmuth & Johnson, PLLC	Wells Fargo - Court Administrator – Filing Fee: Motion for Admission Pro Hac Vice, Proposed Order Granting PHV.	\$80.00
	Stranch, Jennings & Garvey, PLLC	JAMS Reimbursement	(\$1,143.75)
TOTAL:			\$8,348.43

4. These expenses were reasonable and necessary to this litigation and are the type of costs normally charged to a paying client, so they are reimbursable.

5. Pursuant to the Settlement, SCH A will pay all costs and expenses of settlement notice and administration, including, but not limited to, the expense of the Settlement Administrator, the expense of preparing the Class Member List, and all expenses involved in providing notice to the members of the Settlement Class and distributing the benefits of the settlement to Class Members, not to exceed \$200,000.00, out of the Fee and Expense Fund. Settlement Agreement. ¶ 4.3.

6. The Settlement Administrator in this case, Kroll, has proposed and estimated the costs of administration at approximately \$66,600.00.

7. Deducting from the \$200,000.00 Fee and Expense Fund the \$66,600.00 for costs of settlement notice and administration, deducting the expenses of \$8,348.43 and deducting the Service Award of \$1,500.00 leaves the net amount for attorneys' fees of \$123,551.57.

8. Class Counsel estimates the value of the settlement, not including the costs of notice and administration, to be approximately \$500,000.00, which is comprised of the amount available for economic losses (\$300,000), plus the fees and expenses, costs of notice and administration and service award (\$200,000). The requested fee is therefore 24.71% of the value of the recovery.

Pursuant to Minn. Stat. § 358.116, I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: September 15, 2023

/s/ J. Gerard Stranch, IV
J. Gerard Stranch, IV