

# **EXHIBIT 4**

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

In Re: PARKING HEATERS ANTITRUST LITIGATION	Case No. 15-MC-940 (DLI) (JO)
THIS DOCUMENT RELATES TO: <i>All Direct Purchaser Class Actions</i>	

**DECLARATION OF ALLAN STEYER  
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN  
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, ALLAN STEYER, declare as follows:

1. I am a partner with Steyer Lowenthal Boodrookas Alvarez & Smith LLP. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, on behalf of the direct purchaser class in *In re Parking Heaters Antitrust Litigation* (the "Action").

2. For the period starting from the inception of the Action through and including September 30, 2018, the total number of hours spent by my firm working on the Action was 341.0, with a corresponding lodestar of **\$282,275.00** based on current hourly rates. In connection with representing the Plaintiffs in the Action my firm did the following:

- 1) Discovery: drafted interrogatories, requests for production, and requests for admission propounded to defendants; prepared client responses to defendants' discovery; worked on the ESI protocol, client questionnaire and Rule 26 disclosures; and reviewed documents produced by defendants;
- 2) Legal research regarding damages/offsets and other topics;


- 3) Participated in meetings with defense counsel including proffers;
- 4) Developed litigation and settlement strategies with co-lead counsel;
- 5) Prepared for and participated in mediations and meetings with the mediators;
- 6) Reviewed and edited settlement agreements and conferred with co-lead counsel regarding the agreements.

The lodestar amount was performed by attorneys and professional staff at my firm for the benefit of the direct purchaser class. The hourly rates for the attorneys and professional staff in my firm are the usual and customary hourly rates charged by my firm in similar matters.

3. My firm has incurred a total of **\$3,188.07** in unreimbursed costs and expenses in connection with the prosecution of the Action from inception through and including September 30, 2018. These costs are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

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

Executed this 8<sup>th</sup> day of October, 2018, in San Francisco, California.

  
Allan Steyer

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**EXHIBIT A TO THE DECLARATION OF ALLAN STEYER  
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN  
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

**Reported Hours and Lodestar  
Through September 30, 2018**

<b>Name</b>	<b>Role</b>	<b>Year</b>	<b>Hours</b>	<b>Rate</b>	<b>Lodestar</b>
Allan Steyer	P	2015	43.8	\$980	\$42,924.00
Allan Steyer	P	2016	45.5	\$980	\$44,590.00
Allan Steyer	P	2017	61.8	\$980	\$60,564.00
Allan Steyer	P	2018	1.2	\$980	\$1,176.00
Donald Scott Macrae	OC	2015	83.1	\$920	\$76,452.00
Donald Scott Macrae	OC	2016	13.0	\$920	\$11,960.00
Donald Scott Macrae	OC	2017	10.1	\$920	\$9,292.00
Donald Scott Macrae	OC	2018	1.0	\$920	\$920.00
Alexander D. Kullar	A	2015	5.5	\$610	\$3,355.00
Alexander D. Kullar	A	2016	20.2	\$610	\$12,322.00
Gabriel D. Zeldin	A	2015	3.2	\$480	\$1,536.00
Gabriel D. Zeldin	A	2016	.8	\$480	\$384.00
Suneel Jain	A	2017	43.0	\$360	\$15,480.00
Hugo Thommasson	PL	2015	8.8	\$150	\$1,320.00
<b>Totals:</b>			<b>341.0</b>		<b>\$282,275.00</b>

P Partner  
OC Of Counsel  
A Associate  
LC Law Clerk  
PL Paralegal  
I Investigator  
CA Contract Attorney

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**EXHIBIT B TO THE DECLARATION OF ALLAN STEYER  
IN SUPPORT OF PLAINTIFFS' MOTION FOR AN  
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

**Reported Expenses on Behalf of Direct Purchaser Plaintiffs  
Through September 30, 2018**

<b>Category</b>	<b>Amount</b>
Commercial Copies	\$0.00
Internal Reproduction/Copies	\$0.00
Computer Research	\$477.76
Court Fees (filing, etc.)	\$700.00
Court Reporters/Transcripts	\$0.00
Telephone/Fax	\$15.39
Postage/Express Delivery/Messenger	\$39.95
Professional Fees (expert, investigator, accountant, etc.)	\$0.00
Witness/Service Fees	\$144.85
Travel: Air Transportation, Ground Travel, Meals, Lodging, etc.	\$1,810.12
Miscellaneous	\$0.00
<b>Total</b>	<b>\$3,188.07</b>