

# **EXHIBIT 2**

**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 MICHAEL L. ROBERTS  
IN SUPPORT OF PLAINTIFFS’ MOTION FOR AN  
AWARD OF ATTORNEYS’ FEES AND LITIGATION EXPENSES**

I, Michael L. Roberts, declare as follows:

1. I am the managing partner with Roberts Law Firm, P.A.. 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”). I make this declaration based on personal knowledge. If called as a witness, I could and would testify competently as to the matters stated herein.

2. I am one of the Co-Lead Counsel for direct purchaser plaintiffs in this matter.

3. Roberts Law Firm, P.A. has undertaken this litigation solely on a contingency fee basis,

4. During the course of this litigation, Roberts Law Firm, P.A. has been involved in the following activities on behalf of the direct purchaser plaintiffs: served as co-lead counsel; co-managing the case in its entirety; made critical decisions throughout the litigation; handled client communications; made court appearances and prepared for court appearances; engaged in

discovery; consulted experts; handled investigations and factual research; co-managed litigation strategy, analysis and case management; drafted pleadings, briefs and pretrial motions; and co-managed settlement negotiations.

5. The information in this Declaration regarding my firm's time and expenses is taken from time and expense printouts and supporting documentation prepared and maintained by the firm in the ordinary course of business.

6. 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 **1,756.85**, with a corresponding lodestar of **\$1,113,742.00** based on current hourly rates, as shown in Exhibit B to this Declaration. 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.

7. The costs and expenses pertaining to this case are reflected on the books and records of my firm. These books and records are prepared from receipts, expense vouchers, check records, and other documents and are an accurate record of the costs and expenses. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed.

8. My firm has incurred a total of **\$71,335.46** in unreimbursed costs and expenses in connection with the prosecution of the Action from inception through and including September 30, 2018, as shown in Exhibit C to this Declaration.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 15<sup>th</sup> day of October, 2018, in Little Rock, AR.

A handwritten signature in black ink, appearing to read "Mike Roberts". The signature is written in a cursive, flowing style.

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Michael L. Roberts

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**EXHIBIT A TO THE DECLARATION OF MICHAEL L. ROBERTS  
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>
April Burton	PL	2015	1.1	\$150.00	\$165.00
April Burton	PL	2016	1.2	\$150.00	\$180.00
April Burton	PL	2017	.4	\$150.00	\$60.00
April Burton	PL	2018	.3	\$150.00	\$45.00
Angelicia Isclaw	PL	2016	6.3	\$150.00	\$945.00
Angelicia Isclaw	PL	2017	25.1	\$150.00	\$3,765.00
Angelicia Isclaw	PL	2018	3.7	\$150.00	\$555.00
Debra Josephson	P	2015	17.6	\$710.00	\$12,496.00
Debra Josephson	P	2016	1.9	\$710.00	\$1,349.00
Debra Josephson	P	2017	36.8	\$710.00	\$26,128.00
Emily Neal	P	2015	4.5	\$710.00	\$3,195.00
Emily Neal	P	2017	4.6	\$710.00	\$3,266.00
George Ernst	OC	2017	42.7	\$350.00	\$14,945.00
Jana Law	P	2015	9.6	\$550.00	\$5,280.00
Jana Law	P	2016	34.1	\$550.00	\$18,755.00
Jana Law	P	2017	209.7	\$550.00	\$115,335.00
Jana Law	P	2018	2.2	\$550.00	\$1,210.00
Jing Zhao	A	2015	80.8	\$350.00	\$28,280.00

<b>Name</b>	<b>Role</b>	<b>Year</b>	<b>Hours</b>	<b>Rate</b>	<b>Lodestar</b>
Jing Zhao	A	2016	145.8	\$350.00	\$51,030.00
Jing Zhao	A	2017	29.4	\$350.00	\$10,290.00
Karen Halbert	P	2015	.5	\$710.00	\$355.00
Karen Halbert	P	2016	173.8	\$710.00	\$123,398.00
Karen Halbert	P	2017	335.5	\$710.00	\$238,205.00
Mike Roberts	P	2015	75.5	\$860.00	\$64,930.00
Mike Roberts	P	2016	75.2	\$860.00	\$64,672.00
Mike Roberts	P	2017	77.95	\$860.00	\$67,037.00
Mike Roberts	P	2018	12.3	\$860.00	\$10,578.00
Stephanie Smith	P	2015	144.9	\$710.00	\$102,879.00
Stephanie Smith	P	2016	136.4	\$710.00	\$96,844.00
Stephanie Smith	P	2017	65	\$710.00	\$46,150.00
Stephanie Smith	P	2018	2	\$710.00	\$1,420.00
<b>Totals:</b>					<b>\$1,113,742.00</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 MICHAEL L. ROBERTS  
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	
Internal Reproduction/Copies	
Computer Research	\$2,082.40
Court Fees (filing, etc.)	\$9,120.00
Court Reporters/Transcripts	
Telephone/Fax	
Postage/Express Delivery/Messenger	\$308.57
Professional Fees (expert, investigator, accountant, etc.)	\$33,562.50
Witness/Service Fees	
Travel: Air Transportation, Ground Travel, Meals, Lodging, etc.	\$26,261.99
Miscellaneous	
<b>Total</b>	<b>\$71,335.46</b>