



around the state, including Des Moines, Adel, and Davenport. H&H has an excellent reputation in Iowa as successfully handling litigated matters.

4. I am a partner at H&H. I received my Juris Doctorate from Washburn University in 2013 and my Bachelor of Arts from the University of Kansas in 2010. I am admitted to practice in Iowa, Kansas, the United States District Court for the Southern District of Iowa, the United States District Court for the Northern District of Iowa, and the United States District Court for the District of Kansas. I have ten years of experience litigating personal injury, contractual, insurance, probate, and gaming matters, as well as agency cases involving workers' compensation.

5. Attorney Robin Maxon is a partner at H&H. She received her Juris Doctorate from Drake University in 1982 and her Bachelor of Science from the University of Missouri in 1978. She is admitted to practice in Iowa, Kansas, the United States District Court for the Southern District of Iowa, the United States District Court for the Northern District of Iowa, and the United States District Court for the District of Kansas. She has 41 years of experience litigating personal injury, contractual, insurance, probate, and gaming matters, as well as agency cases involving workers' compensation.

6. Attorney R. Ronald Pogge is a partner at H&H. He received his Juris Doctorate from Drake University in 1976 and his Bachelor of Arts from the University of Notre Dame in 1973. He is admitted to practice in Iowa, Arizona, the United States District Court for the Southern District of Iowa, and the United States District Court for the Northern District of Iowa. He has 47 years of experience litigating personal injury, contractual, and insurance matters, as well as agency cases involving workers' compensation and representing professionals before various professional boards.

7. Lisa M. Rickers received her Bachelor of Arts from Buena Vista University in 2014. She was a litigation paralegal at H&H and has 13 years of experience working in the legal field.

8. The schedule below is a summary reflecting the amount of time spent by the H&H attorneys and professional support staff who were involved in this litigation. The schedule includes a lodestar calculation using 2023 billing rates or equivalent 2023 billing rates for an attorney or paralegal who left the firm prior to 2023. The following schedule was prepared from time records regularly prepared and maintained by H&H, which are available at the Court's request. Time expended in preparing this declaration and reviewing the application for fees and reimbursement of related expenses are excluded from the below and not reflected. In addition, hours worked by a few attorneys and staff who provided occasional "spot project" support at various points in the case also have been excluded and are not reflected below.

<b>Attorneys</b>	<b>Current Rate</b>	<b>Hours</b>	<b>Value</b>
Robin G. Maxon (Partner)	\$350	474	\$165,900.00
Chandler M. Surrency (Partner)	\$350	296.6	\$103,810.00
R. Ronald Pogge (Partner)	\$350	2.4	\$840.00
<b>Paralegals</b>	<b>Current Rate</b>	<b>Hours</b>	<b>Value</b>
Lisa M. Rickers (Paralegal)	\$100	5.5	\$550.00
		<b>778.8</b>	<b>\$271,100.00</b>

9. H&H's rates are at or below the rates for lawyers of similar skill, reputation, and experience in this market. Given the nature of this case and H&H's expertise, counsel's rate of \$350 is reasonable in this District, given the prevailing case law. *See, e.g., Bus. Leaders Christ v. Univ. of Iowa*, No. 3:17-cv-0080-SMR-SBJ (S.D. Iowa Nov. 10, 2021), ECF No. 147 (finding rates for central Iowa-based counsel between \$295–\$350 per hour "eminently reasonable") (citing *Animal Legal Def. Fund v. Reynolds*, 385 F. Supp. 3d 840, 844 (S.D. Iowa 2019) (awarding attorney fees at rate of \$230–\$400 per hour at Des Moines-based rate)).

10. The total number of hours expended on this litigation by H&H attorneys and paralegals through August 31, 2023, is **778.8 hours**. The total lodestar value of these hours, derived by multiplying each H&H professional's hours by his or her current hourly rate, is **\$271,100.00**. H&H's work has continued beyond August 31, 2023. In my professional judgment, the time expended, services rendered, and overall fees incurred are fair, reasonable, and necessary in light of the legal and factual issues in this litigation. The hourly rates for H&H's attorneys and professional support staff are the firm's standard hourly rates. The hourly rate for H&H's attorneys on this matter is \$350.

11. H&H worked with Class Counsel in this case to complete filings, to advise on matters of procedure under the local rules, and to attend hearings and discuss strategy on various aspects of the litigation. We reviewed all filed pleadings and tracked the progress of the litigation. Throughout the litigation, we reviewed discovery responses, accessed documents productions, and monitored discovery disputes and their resolution.

12. Through August 31, 2023, the expenses incurred by H&H in this litigation total \$1,094.05. Of those expenses, \$400.00 was spent on filing fees, and \$694.05 was spent on printing and copying. These expenses were reasonably necessary to the prosecution of this case and are of the type H&H normally incurs in litigation.

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

Dated: September 25, 2023

/s/ Chandler M. Surrency  
Chandler M. Surrency