

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

DORIS JEFFRIES, on behalf of herself and all  
other similarly situated,

Plaintiff,

v.

VOLUME SERVICES AMERICA, INC. (d/b/a  
Centerplate and Centerplate/NBSE); and DOES 1  
THROUGH 10,

Defendants.

Case No. 1:17-cv-01788 (CKK)

Hon. Colleen Kollar-Kotelly

**DECLARATION OF CHARLES J. LADUCA**

I, Charles J. LaDuca, declare as follows:

1. I am a partner and firm chairman at Cuneo Gilbert and LaDuca, LLP and Local Counsel for Plaintiff Class in the above-entitled action. I am submitting this declaration in support of Plaintiff's (1) Unopposed Motion For Final Approval Of Class Action Settlement and (2) Unopposed Motion For An Award Of Attorneys' Fees, Costs, And Class Representative Award.

2. Cuneo Gilbert & LaDuca, LLP has devoted the majority of its practice to the representation of clients involved in consumer protection, products liability, antitrust, securities and corporate governance. The firm has achieved success for a range of clients by: working to recover hundreds of millions of dollars for homeowners with defective construction materials; helping to recover billions of dollars in shareholder litigation (notably, the firm served as Washington counsel for the plaintiffs in the Enron Securities Litigation, *In re Enron Corp. Sec. Litig.*, No. H-01-3624 (S.D. Tex. 2006)); obtaining compensation for Holocaust survivors (*see*

*Rosner, et al. v. United States*, No. 01-cv-1859 (S.D. Fla.), the firm acted as Co-Lead Counsel in a case on behalf of survivors of the Holocaust in Hungary whose fortunes were misappropriated by the U.S. government in the final days of World War II); and, in several jurisdictions, ending the practice of jails subjecting minor law violators to unconstitutional strip searches. In addition, in 1991, with two California firms, the firm brought the so-called “Joe Camel” case, *Mangini v. RJ Reynolds Tobacco Co.*, 7th Cal. 4th 1057 (1994), which alleged essentially that R. J. Reynolds Tobacco Company's Joe Camel Advertising Campaign illegally tricked children into smoking cigarettes.

3. I am a member in good standing of the State Bar of New York, and Washington, D.C., and I have never been the subject of any type of disciplinary proceeding. I am admitted to practice before the New York State Court of Appeals, U.S. Supreme Court, U.S. Court of Appeals (DC, Second, Third, Sixth and Ninth Circuits), U.S. District Court, Colorado, U.S. District Court, District of Columbia, U.S. District Court, C.D. Illinois, U.S. District Court, W.D. Michigan, U.S. District Court, N.D.N.Y., U.S. District Court, W.D.N.Y., and the U.S. District Court, S.D.N.Y.

4. I have been admitted to the Bar of the State of New York since June 26, 2001. My practice has been devoted to the prosecution of class actions on behalf of Plaintiffs. I have served as lead counsel and co-lead counsel in numerous class action and multidistrict litigation (“MDL”) cases. The cases I have prosecuted include defective product and consumer protection claims similar to the ones brought in this action. Examples are: *In re: CertainTeed Corp. Roofing Shingle Products Liability Litig.*, MDL No. 1817 (E.D.Pa.) (defective organic shingles litigation, firm served as Co-lead Counsel in the MDL); *In re Building Materials Corp. of America Asphalt Roofing Shingle Prods. Liab. Litig.*, MDL No. 2283 (D.S.C.) (Co-Lead Counsel); *In re: Kitec Plumbing System Products Liability Litig.*, MDL No. 2098 (N.D. Tex.) (Co-Lead Counsel); *In re*

*Zurn Pex Plumbing Litig.*, MDL No. 1958 (D. Minn.) (Chair of the Executive Committee) ; *In re Uponor, Inc. FI807 Plumbing Prods. Liab. Litig.*, MDL No. 2247 (D. Minn.) (Chair of the Executive Committee); *In re: CertainTeed Fiber Cement Siding Litig.*, MDL No. 2270 (E.D. Pa.); *In re IKO Roofing Shingle Products Liability Litig.*, MDL No. 2104 (M.D. Il.) (Chair of the Executive Committee); *In re: HardiPlank Fiber Cement Siding Litig.*, MDL No. 2359 (D. Minn.); and *Melillo, et. al. v. Building Products of Canada*, Case No. 618-11 (Vermont St. Ct.) (Co-Lead Counsel).

5. My firm's time and costs are itemized below. Through September 1, 2022, we have devoted 59.50 hours of time on this matter.

Name	Years of Experience	Hours	Rate	Lodestar
Charles LaDuca	22	5.0	\$919/hr	\$4,595.00
Monica Miller	31	1.5	\$919/hr	\$1,378.50
Katie Van Dyck	18	47.5	\$919/hr	\$43,652.50
Paralegals		5.5	\$200/hr	\$1,100
<b>Total</b>		<b>59.50</b>		<b>\$50,726.00</b>

6. My firm's total lodestar amount of \$50,726.00 is based on the LSI *Laffey* Matrix, which is consistent my firm's usual and customary rates.

7. These figures and amounts reflected in the foregoing paragraph are derived from contemporaneously kept time records that are inputted into a computerized billing system maintained by my firm.

8. Based upon my experience with other class action matters, I believe that the time expended by my firm in connection with this action is reasonable in amount and was necessarily incurred in connection with the prosecution of this action. If the Court requires Plaintiff's counsel to submit their detailed time records, I request submission *in camera* because the time records are

unredacted and contain sensitive and privileged information as well as information protected by the work product doctrine.

9. My firm has incurred a total of \$113.80 in expenses in connection with the prosecution of this litigation, and are itemized below. These expenses are reflected in the books and records of this firm. These books and records are prepared from expense vouchers, check records, and other documents.

<b>Expense Category</b>	<b>Total</b>
Legal Research/Pacer	\$13.80
Filing Fees	\$100.00
<b>Total</b>	<b>\$113.80</b>

I declare under penalty of perjury under the laws of the District of Columbia that the foregoing is true and correct.

Executed this 15th day of September, 2022, in the State of Maryland.

*s/ Charles J. LaDuca*  
Charles J. LaDuca