

I, John Gravante III, declare as follows:

1. I am an attorney at law licensed to practice in the State of Florida, and I am a partner in the firm of Podhurst Orseck PA, Counsel for Claimants. I make this declaration in support of Claimants' Motion for Entry of Order Finally Approving Class Action Settlement and Motion for Payment of Attorneys' Fees, Cost and Expenses and Incentive Awards for Class Representatives. I have personal knowledge of the facts set forth in this declaration, and, if called as a witness, could and would competently testify thereto under oath.

2. My firm has been involved in every aspect of this action from pre-suit investigation to filing the first Demand for Class Arbitration raising these issues, briefing the arbitration clause's construction with regard to whether proceeding on a class basis was permitted and Respondent's petition to vacate the Arbitrator's clause construction award in the Northern District of California, conducting document discovery, filing the First Amended Demand for Class Arbitration, engaging in protracted settlement negotiations, including an in-person mediation session before David Geronemus, a second in-person mediation session before Judge Carl West (Ret.), as well as numerous telephonic settlement discussions, negotiating the language of the settlement agreement and associated exhibits, working with the settlement administrator to develop the settlement notice and claims program, and working with co-counsel in preparing the preliminary and final approval settlement papers and communicating with class members.

3. I have reviewed my firm's time entries in our billing records, and have used billing judgment to ensure that duplicative or unnecessary time has been excluded and that only time reasonably devoted to the litigation has been included. The time and descriptions displayed in my firm's billing records were regularly and contemporaneously recorded by me and the other timekeepers of the firm pursuant to firm policy in the regular and ordinary course of my firm's business operations, based on underlying records maintained by me and other timekeepers at Podhurst Orseck, and have been and are maintained in the computerized records of my firm based on records that were created at or shortly after the time the actions reflected in those books

and records were actually undertaken. In summary, my office has expended 657.75 hours in attorney and paralegal time on this case through October 6, 2017, and I reasonably anticipate billing at least another 25 hours to this matter from that date through the final approval hearing date. Multiplying the above hours by my firm's standard hourly rates results in a lodestar of \$296,148.75. The hourly rates used to calculate this figure are the usual and customary rates charged for each individual in all of my firm's cases. A breakdown of the lodestar is as follows:

NAME	HOURS	RATE	LODESTAR
John Gravante, Partner	358.25	\$595.00	\$213,158.75
Robert Josefsberg, Senior Partner	1.25	\$850.00	\$1,062.50
Nathalie Bigio Levy, Staff Atty.	46.5	\$285	\$13,252.50
Oscar Campos, Staff Atty.	111.50	\$295	\$32,892.50
Megan Roth, Staff Atty.	16	\$295	\$4,720.00
Justin Levine, Law Clerk	65	\$250	\$16,250.00
Robert Visca, Law Clerk	59.25	\$250	\$14,812.50
TOTAL:	657.75		\$296,148.75

4. My firm incurred a total of \$47,641.59 in expenses in connection with the prosecution of this litigation. They are broken down as follows:

EXPENSE CATEGORY	TOTAL
Arbitrator Fees	\$13,265.00
Mediator Fees	\$16,196.49
Litigation Support Services	\$36.24
Online Research	\$3,088.81
Express Mail	\$42.98
Photocopies	\$34.60

Telephone	\$0.21
Miscellaneous, Travel, etc.	\$14,977.26
TOTAL	\$47,641.59

5. I believe all of the time billed in this case by my firm was appropriate to competently and professionally litigate the class claims against Defendants. All of the time and expenses we incurred was contingent on the outcome of this action.

6. I have been the primary point of contact for Claimant Sarah Diaz throughout the course of this Arbitration. A modest service award of \$10,000 for Ms. Diaz is justified because of her willingness to step forward and represent the class in this Arbitration. As indicated in her Declaration submitted concurrently herewith, Ms. Diaz reviewed relevant pleadings and kept in communication with her counsel throughout the litigation. She was also willing to provide testimony as needed.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on October 9, 2017 at Miami, Florida.

John Gravante, III (PJS, w/ permission)
John Gravante III