

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

<p>In re: LIFE TIME FITNESS, INC., TELEPHONE CONSUMER PROTECTION ACT (TCPA) LITIGATION</p> <p>This document relates to: All actions</p>	<p>Case No.: 0:14-md-02564-JNE-SER MDL Docket No. 2564</p> <p>Declaration of Shawn J. Wanta in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs, and Payment of Incentive Awards</p>
---	---

I, Shawn J. Wanta, declare as follows:

1. I am a partner of the firm of Baillon Thome Jozwiak & Wanta LLP. I am Lead Counsel and a member of the Plaintiffs' Executive Committee in the above-captioned case. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses in connection with services rendered in the above-entitled action.

2. I am a member in good standing of the Bar of Minnesota, and I have never been the subject of any type of disciplinary proceeding. I am admitted to practice before all courts for the State of Minnesota as well as the United States District Court for the Districts of Minnesota, Northern District of Illinois, Central District of Illinois, United States Court of Appeals for the Third Circuit, and United States Court of Appeals for the Eighth Circuit.

3. I am a 2008 graduate of William Mitchell College of Law, where I received my Juris Doctor degree. I was admitted to the Minnesota State Bar in 2008.

4. I have served in the following court-appointed leadership capacities: Class Counsel in *Rehberg, et al. v. Flowers Foods Inc., et al.*, 12-cv-00596-MOC-DSC (W.D.N.C.); *Dennings v. Clearwire Corporation*, C10-1859-JLR (D. Wash.); *Yarbrough v. Martin's Famous Pastry Shoppe, Inc.*, 11-cv-02144 (M.D. Pa.); *Low v. San Diego Union Tribune*, 11-cv-01090 (S.D. Ca.); *Chavez v. West Side Comm. Healthcare Svcs., Inc.* 14-cv-00207 (D. Minn.); *Gulbankian, et al. v. MW Manufacturers, Inc.*, 10-cv-10392 (D. Mass.); *Hartshorn, et al. v. MW Manufacturers, Inc.*, 2012-cv-30122 (D. Mass.); and *Harrison v. Legal Helpers Debt Resolution, LLC, et al.*, 12-cv-02145 (D. Minn.); Executive Committee Member and Co-Chair of the Discovery Committee in *In re HardiePlank Fiber Cement Siding Litigation*, MDL No. 2359 (D. Minn); and Executive Committee Member for *Wright, et al. v. Owens Corning*, 09-cv-01567 (W.D. Pa.). Mr. Wanta has substantially contributed, in leadership or other capacities, to the following class action cases: *In re IKO Roofing Shingles Products Liability Litigation*, MDL. 2104 (C.D. Ill.); *Pagliaroni v. Mastic Home Exteriors, et al.*, 12-cv-10164 (D. Mass.); *In re: CertainTeed Fiber Cement Siding Litigation*, MDL. No 2270 (E.D. Pa.); *Davis, et al. v. SOH Distribution Co.*, 09-cv-237 (M.D. Pa.); *Taylor, et al. v. Corporate Transit of America*, 09-05709 (N.D. Ill.); *Egtedt, et al. v. West Publishing Corp.*, 19HA-CV-09-1660 (Dakota County, Minn.); *Cruz, et al. v. Lawson Software, Inc.*, Civil File No. 08-5900 (D. Minn.).

5. The Minneapolis law firm of Baillon Thome Jozwiak & Wanta LLP was established in 2011. Earlier, the founding partners of Baillon Thome Jozwiak & Wanta LLP; Frances E. Baillon, Joni M. Thome, Christopher D. Jozwiak, and Shawn J. Wanta;

worked together at a Minneapolis-based law firm specializing in employment and class action litigation. Mses. Baillon, Thome, and Mr. Jozwiak were members of the firm's management committee and Mr. Wanta led the firm's class action practice. Baillon Thome Jozwiak & Wanta LLP practices exclusively in plaintiffs' side complex and employment litigation. The firm's class action practice is focused primarily on consumer and employment law. Mr. Wanta and Mr. Jozwiak have been appointed to leadership in multidistrict litigations and appointed as class counsel in numerous other class actions.

6. The Named Plaintiffs have assisted Class Counsel by providing evidence and gathering facts for this case for the complaints and other filings; collecting documents to assist in negotiating a favorable settlement; advocating on behalf of the class members; and staying abreast of the Action and settlement negotiations

7. The total number of hours spent on this litigation by my firm is 569.5. My firm spent 214.4 hours on legal research and drafting pleadings and briefs; 54.1 hours on discovery; 144.8 hours on case management, strategy, and settlement administration; 128 hours on settlement negotiations and drafting settlement documents; and 28.2 hours on court appearances.

8. The total lodestar amount for attorney/professional time based on my firm's usual and customary rates is \$246,569. In addition, my firm wrote off 80 hours in hours to ensure that the fees submitted by firm were reasonable.

9. A breakdown of my firm's lodestar is as follows:

Name	Hours	Rate	Lodestar Total
Shawn J. Wanta (P)	360.2	\$480	\$172,896.00
Christopher D. Jozwiak (P)	114.1	\$475	\$54,197.50
Cassie Benson (A)	29.3	\$245	\$7,178.50.00
Summer Associate	9.4	\$190	\$1,786.00
Paralegal II	53.3	\$190	\$10,127.00
Legal Assistant II	3.2	\$120	\$384.00
TOTAL			\$246,569

10. The figures and amounts reflected in the foregoing paragraph are derived from daily time records that are inputted into a computerized billing system maintained by my firm. These time records are available for submission to the Court upon request.

11. 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.

12. My firm incurred a total of \$19,748.24 in expenses in connection with the prosecution of this litigation. They are broken down as follows:

EXPENSE CATEGORY	TOTAL
Travel: Meals, Hotels & Transportation	\$5,095.64
Office supplies, photocopies, and printing	\$167.88
Postage	\$7.90
Conference calls	\$57.98
Filing, Witness & Other Fees	\$400
Court Reporters	\$251.70
Westlaw (reduced to 50% of standard rates)	\$4,556.66
Mediation Fees (Hon. Edward Infante, Ret.)	\$9,210.48
TOTAL	\$19,748.24

13. The aforementioned expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense

vouchers, check records, and other documents and are an accurate record of the expenses. The expense records and backup documentation are available for submission to the Court upon request. In addition to the expenses listed here, I anticipate incurring additional costs associated with the forthcoming motion for Final Approval.

I declare under penalty of perjury under the laws of the State of Minnesota that the foregoing is true and correct.

Executed this 4th day of May 2015.

s/ Shawn J. Wanta .
Shawn J. Wanta