

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 Katrina Carroll in Support of Plaintiffs' Motion for Award of Attorneys' Fees, Reimbursement for Expenses, and Payment of Incentive Awards</p>
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I, Katrina Carroll, declare as follows:

1. I am a partner with the firm of Lite DePalma Greenberg, LLC. I am 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 Bars of Illinois and New Jersey, and I have never been the subject of any type of disciplinary proceeding. I am admitted to practice before the State courts of Illinois and New Jersey, the United States District Court for the Northern District of Illinois and the United States District Court for the District of New Jersey.

3. I am a 2000 graduate of the Seton Hall University School of Law, where I received my Juris Doctor degree. I was admitted to the New Jersey State Bar in 2000.

4. As a member of LiteDePalma Greenberg, LLC ("Lite DePalma") and head of Lite DePalma's Chicago office, I have been actively involved in many class actions since 2001, in the areas of consumer fraud, securities fraud and antitrust and have

recovered over a billion dollars for consumers, investors and businesses. During my career, I served as Co-Lead Class Counsel in some of the most prominent securities fraud class actions in the country, including *In re Motorola Securities Litigation* (N.D. Ill.), where my firm achieved a \$193 million settlement for aggrieved investors, and in *In re Tenet Healthcare Corp. Securities Litigation*, (C.D. Cal.), which resulted in settlements for \$216.5 million against one set of defendants and \$65 million against the auditor defendant, representing one of the largest auditor settlements of all time. I am currently involved in some of the most challenging class action litigation in the country today, and am serving in lead roles in two major consumer matters pending in the United States District Court for the Northern District of Illinois, *McCain v. Rust- Oleum*, Docket No. 14-cv-4852 (Hon. Amy J. St. Eve), and *Mednick v. Precor, Inc.*, Docket No 14-cv-3624 (Hon. Harry D. Leinenweber).

5. The total number of hours spent on this litigation by my firm is 185.30. My firm spent 12.6 hours on research and preparation of the complaint; 11.8 hours on discovery related matters; 1.5 hours on investigation; 4.3 hours on class certification motions; 8.7 hours on the motions to transfer filed before the Judicial Panel for Multi-District Litigation; 45.6 hours on mediation; and 97.8 hours on settlement matters.

6. The total lodestar amount for attorney/professional time based on my firm’s usual and customary rates is \$131,672.50.

7. A breakdown of my firm’s lodestar is as follows:

Name	Hours	Rate	Lodestar Total
Joseph J. DePalma	.3	750	\$225.00
Katrina Carroll	159.4	750	\$120,000.00

Kyle A. Shamberg	13.1	475	\$10,972.50
Paralegal I	1.9	250	\$475.00
Paralegal II			
Paralegal III			
Document Clerks			
TOTAL			\$131,672.50

8. 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.

9. 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.

10. My firm incurred a total of \$3,234.11 in expenses in connection with the prosecution of this litigation. They are broken down as follows:

EXPENSE CATEGORY	TOTAL
Travel: Meals, Hotels & Transportation	\$2,564.72
Messenger, Overnight Delivery	\$58.30
Filing, Witness & Other Fees	\$519.95
Lexis, Westlaw, Online Library Research	\$91.14
TOTAL	\$3,234.11

11. 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.

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

Executed this 4th day of May 2015.



KATRINA CARROLL