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19 *Attorneys for Lead Plaintiffs*
20 *Oklahoma Firefighters Pension & Retirement Fund*
21 *and Oklahoma Law Enforcement Retirement System*

22 UNITED STATES DISTRICT COURT
23 CENTRAL DISTRICT OF CALIFORNIA

24 OKLAHOMA FIREFIGHTERS)
25 PENSION & RETIREMENT)
26 SYSTEM and OKLAHOMA LAW)
27 ENFORCEMENT RETIREMENT)
28 SYSTEM, Individually and on Behalf)
of All Others Similarly Situated,)

Plaintiffs,)

v.)

IXIA, VICTOR ALSTON, ATUL)
BHATNAGAR, THOMAS B.)
MILLER, and ERROL GINSBERG,)

Defendants.)

Case No. CV13-08440-DMG(SHx)

DECLARATION OF JEFF S. WESTERMAN

Date: July 29, 2016
Time: 10:00 a.m.
Courtroom: 7
Judge: Hon. Dolly M. Gee

1 JEFF S. WESTERMAN hereby states the following under penalty of
2 perjury:

3 1. I am the founding and managing principal of Westerman Law Corp.
4 of Los Angeles, California. My law firm serves as local counsel for Lead
5 Plaintiffs Oklahoma Firefighters Pension & Retirement Fund and Oklahoma Law
6 Enforcement Retirement System in the above-captioned action (“Action”). I
7 have actively participated in all phases of the prosecution of this Action.

8 2. I respectfully submit this declaration in support of the application for
9 an award of attorneys’ fees and expenses for the benefits achieved as a result of
10 the settlement of the Action.

11 3. From the commencement of this Action through May 31, 2016,
12 Westerman Law Corp. attorneys and paralegals dedicated 154.5 hours to the
13 prosecution of the Action (exclusive of time spent on this application for
14 attorneys’ fees and expenses). Westerman Law Corp.’s total lodestar amount for
15 attorney/paralegal time based on the firm’s current rates is \$108,769. The hourly
16 rates shown below are the usual and customary rates charged for each individual
17 in our cases. A breakdown of the lodestar is as follows:

Timekeeper	Total Hours through May 31, 2016	Rate	Total through May 31, 2016
Jeff Westerman	103.2	\$880	\$88,176
Anna Faircloth (Associate)	4.8	\$460	\$2,208
Jordanna Thigpen (Associate)	33.8	\$450	\$15,210
TOTAL	154.5		\$108,769

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24 4. During the course of this Action, Westerman Law Corp. incurred
25 and disbursed \$3,887.78 in expenses necessary to the prosecution of the Action
26 through May 31, 2016, including travel expenses to the mediation in New York.
27 These expenses are broken down as follows:
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Disbursements	
Attorney Service/Filing Fee/Pacer	\$1,362.30
Travel	\$2,493.48
Postage & Delivery	\$29.00
TOTAL	\$3,384.78

5. Westerman Law Corp.'s expenses pertaining to this case are reflected in the computerized books and records of the firm. These records are prepared from invoices, bills, expense vouchers and check records, kept in the normal course of business.

6. I respectfully request that the Court award the attorneys' fees and expense reimbursement requested.

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

Dated: June 3, 2016



Jeff S. Westerman