

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CHAD UDEEN, MARY JANE  
JEFFERY, LYDIA RUNKEL,  
MICHAEL BOLICK, GARY GILPIN,  
ALICIA SMITH, and SUSAN  
WILLIAMS, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

SUBARU OF AMERICA, INC., and  
SUBARU CORPORATION,

Defendants.

No. 1:18-cv-17334-RBK-JS

**JURY TRIAL DEMANDED**

**CLASS ACTION**

**DECLARATION OF J. LLEWELLYN MATHEWS IN SUPPORT  
OF PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT AND ATTORNEY'S  
FEES, LITIGATION EXPENSES, AND SERVICE AWARDS**

I, J. Llewellyn Mathews, declare as follows:

1. I am a sole proprietor admitted to practice before the Supreme Court of New Jersey and the United States District Court for the District of New Jersey. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Attorneys' Fees, Litigation Expenses, and Service Awards. I have personal knowledge of the matters discussed herein, and if called as a witness could testify competently thereto.

2. From the inception of this case through January 24, 2020, I devoted a

total of fourteen billable hours of work on this case. Based upon hourly rate currently charged to my clients, the total lodestar value of this billable time is \$4,900.00. Besides me, no other attorney or paralegal at my firm worked on this matter. I have over 46 years of experience focusing on general civil litigation in the State and Federal Courts of New Jersey. My role in this case has been to serve as local New Jersey counsel for the firm of Chimicles Schwartz Kriner & Donaldson-Smith, LLP. Attached as **Exhibit A** to this Declaration is a Statement that lists descriptions of the services rendered, the number of hours expended, my hourly rate and the resulting value for the services I have provided. This schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by me. My detailed time records are available to the Court for inspection upon request.

3. All of the time I have billed to this case was reasonable and necessary in the prosecution of this case. It was also performed on a contingency basis. I have not been compensated for any of its work on this matter to date.

4. I have not incurred any unreimbursed expenses.

I declare pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: January 16, 2020

By: /s/ J. Llewellyn Mathews  
J. Llewellyn Mathews

EXHIBIT "A"

**Statement**

J. LLEWELLYN MATHEWS

Attorney-at-Law  
 309 Fellowship Road, Ste 200  
 Mt. Laurel, NJ 08054

Date

1/16/2020

To:

CHAD UDEEN, et al,  
 vs.  
 SUBARU OF AMERICA, INC., et al

Date	Description	Quantity	Rate	Amount
11/28/2018	Finalization and filing of Udeen Complaint	3.00	350.00	1,050.00
11/29/2018	Confirm filing of complaint; download & forward "as filed" complaint, CIS & Track Assignment Notice; set up new file	0.80	350.00	280.00
11/29/2018	download & forward standard Summons form; prepare Acknowledgment of Service	0.40	350.00	140.00
12/18/2018	Review email from C. Watkins, Esq.; download & forward removal papers as filed with NJ Superior Court	0.30	350.00	105.00
12/18/2018	Review removal papers filed with US District Court; download & forward to B. Johns	0.30	350.00	105.00
12/18/2018	Review & forward Judicial Assignment Notice & review & diary Notice of Initial Conference	0.20	350.00	70.00
12/18/2018	Review Clerk's QC message, Cert. of Compliance & Corp Disclosure	0.10	350.00	35.00
12/18/2018	Review entry of appearance by B. Johns	0.10	350.00	35.00
12/19/2018	Review entry of appearance by A. Ferrick	0.10	350.00	35.00
12/19/2018	Review proposed Stipulation & Order Extending Time	0.10	350.00	35.00
12/20/2018	Review signed Stipulation and Order Extending Time	0.10	350.00	35.00
12/26/2018	Review & diary Text Order regarding time of Initial Conference	0.20	350.00	70.00
01/03/2019	Review Letter to the court from N. Walters regarding Initial Conference	0.20	350.00	70.00
01/04/2019	Review Text Order regarding Initial Conference & update diary	0.20	350.00	70.00
01/04/2019	Review entry of appearance by C. Watkins	0.10	350.00	35.00
01/04/2019	Review letter from B. Johns to the Court regarding discovery schedule	0.10	350.00	35.00
01/16/2019	Review & download entry of Appearance by D. Lipinsky	0.10	350.00	35.00
01/16/2019	Telephone status conference with Judge Schneider & counsel	0.50	350.00	175.00
01/16/2019	Review & download Text Order	0.10	350.00	35.00
01/21/2019	Brief review of draft Motion to appoint co-lead counsel & liaison counsel	0.20	350.00	70.00
01/22/2019	T/C w/ B Johns regarding motion to designate lead counsel	0.10	350.00	35.00
01/25/2019	Download and review Letter Order of 1-25-2019 & re-check Motion to appoint lead counsel & proposed Order	0.20	350.00	70.00
02/01/2019	Download and brief review of First Amended Complaint and Exhibits	0.40	350.00	140.00
02/13/2019	Download & review letter Watkins to Judge Schneider regarding dispute over subpoena	0.10	350.00	35.00

Amount Due

\$4,900.00

# Statement

J. LLEWELLYN MATHEWS  
 Attorney-at-Law  
 309 Fellowship Road, Ste 200  
 Mt. Laurel, NJ 08054

Date
1/16/2020

To:
CHAD UDEEN, et al, vs. SUBARU OF AMERICA, INC., et al

Date	Description	Quantity	Rate	Amount
02/15/2019	Teleconference with Magistrate Judge Schneider	0.40	350.00	140.00
03/01/2019	Download and review Defendants' Motion to Dismiss	0.80	350.00	280.00
03/08/2019	Review letter from Sbuaru Defts. regarding stay of discovery	0.20	350.00	70.00
03/08/2019	Review letter from D. Lapinski opposing stay of discovery	0.20	350.00	70.00
03/13/2019	Review Memorandum, OPinion & Order re stay of discovery	0.20	350.00	70.00
03/18/2019	Review Memorandum in Opposition to Motion to Dismiss	0.30	350.00	105.00
03/25/2019	Review Replay regarding Motion to Dismiss	0.20	350.00	70.00
04/04/2019	Review Plaintiffs' Intial Disclosures	0.20	350.00	70.00
04/08/2019	Review Defendants' INTial Disclosures	0.20	350.00	70.00
04/11/2019	Review text order	0.10	350.00	35.00
04/12/2019	T/C w/ B. Johns regarding mediation	0.20	350.00	70.00
04/12/2019	Review text order	0.10	350.00	35.00
05/15/2019	Review text order	0.10	350.00	35.00
05/21/2019	Review Amended Scheulind Order	0.10	350.00	35.00
05/30/2019	Review & calendar Amended Scheduling Order	0.20	350.00	70.00
06/18/2019	Review Watkins Declaration re confidentiality order	0.20	350.00	70.00
08/20/2019	Review letter from B, Johns re extension of time & proposed order	0.10	350.00	35.00
08/30/2019	Review & sign Settlement Agreement	0.50	350.00	175.00
08/30/2019	Review Motion for Settlement & Memorandum	0.40	350.00	140.00
09/03/2019	Review Order setting deadlines	0.10	350.00	35.00
09/10/2019	Review & forward copy of email from D. Lombardo	0.20	350.00	70.00
09/26/2019	Review text order amending caption	0.10	350.00	35.00
10/01/2019	Review letter from B. Johns filed with the Court	0.20	350.00	70.00
10/04/2019	Review Opinion approving settlement	0.30	350.00	105.00
11/04/2019	Review draft fee petition	0.30	350.00	105.00
11/21/2019	Review Order exit ending time	0.10	350.00	35.00

Amount Due
\$4,900.00