UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

MARK SHAFFER, MARGARET MAULDIN, CHARAFEDDINE ZAITOUN, and MARC LESSIN, Individually and on Behalf of All Others Similarly Situated,

Civil No. 1:20-cv-01145-RJL

Plaintiffs,

v.

THE GEORGE WASHINGTON UNIVERSITY and THE BOARD OF TRUSTEES OF GEORGE WASHINGTON UNIVERSITY,

Defendants.

SUPPLEMENTAL DECLARATION OF DANIEL J. KUROWSKI IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL AND MOTION FOR ATTORNEYS' FEES, COSTS, AND CLASS REPRESENTATIVE SERVICE AWARDS

Case 1:20-cv-01145-RJL Document 73 Filed 03/19/24 Page 2 of 17

I, Daniel J. Kurowski, declare under penalty of perjury as follows:

1. I am a Partner at Hagens Berman Sobol Shapiro LLP ("Hagens Berman") and I represent Plaintiffs in this litigation as well as the interests of the class. I am a member in good standing of the State Bar of Illinois and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have personal knowledge of the facts stated in this declaration. If called as a witness, I could and would testify competently to them.

2. Under the Court's Preliminary Approval Order (ECF No. 67), "[a]ny members of the Settlement Class who have not timely filed a request for exclusion may object to the fairness, reasonableness, or adequacy of the Settlement Agreement or to a Final Judgment being entered dismissing the action with prejudiced in accordance with the terms of the Settlement Agreement, or to the attorneys' fees and expense reimbursement sought by Class Counsel in the amounts specified in the Notice, or to the Award to the Class Representatives set forth in the Notice and Settlement Agreement." ECF No. 67 \P 20.

3. The Preliminary Approval Order further provides that "[t]o object, members of the Class must sign and file a written objection no later than on or before the Objection/Exclusion Deadline, which the Court orders to be set forth in the Settlement Agreement and Notice. To be valid, the objection must comply with the objection procedures set forth in the Settlement Agreement and Notice." *Id.* ¶ 21.

4. Two objections from three class members were received on the March 11, 2024 deadline for to file and serve objections set in this case. *See* ECF No. 70 (Objectors Heidloff and West); ECF No. 71 (Objector Aledorf). These were the only objections that Class Counsel received by the objection deadline. And they were the only objections received, timely or otherwise, as of this declaration, Class Counsel did not receive any other objections.

-1-

Case 1:20-cv-01145-RJL Document 73 Filed 03/19/24 Page 3 of 17

5. As part of Plaintiffs' Motion for Attorneys' Fees, Costs, and Class Representative Service Awards, Hagens Berman included in the firm's cost submission a line item reflecting \$87,007.36 in out-of-pocket expenses paid by the firm for "Experts/Consultants." *See* ECF No. 68-4.

6. These expenses were incurred entirely in connection with Plaintiffs' retention of their expert witness, Hal J. Singer, Ph.D. and his firm, EconOne.

7. I received copies, reviewed, and approved for payment by my firm's accounts payable staff the invoices for expert services received from EconOne. True and correct copies of the invoices supporting these paid out-of-pocket expenses are attached hereto as **Exhibit A**.

8. To arrive at the \$87,007.68 value, my firm made the following payments by invoice:

Invoice Number	Hagens Berman Payment Amount
23158	\$14,580.00
23324	\$13,495.36
23520	\$6,370.00
23861	\$42,722.00
24029	\$9,840.00
TOTAL	\$87,007.36

Executed this 19th day of March 2024, in Chicago, IL.

<u>/s/ Daniel J. Kurowski</u> Daniel J. Kurowski

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on March 19, 2024 a true and correct copy of the foregoing, together with all attachments thereto was filed electronically via CM/ECF, which caused notice to be sent to all counsel of record. In addition, a copy was posted on the settlement website at GWsettlement.com, and courtesy copies were emailed to Objectors West, Heidloff and Aledorf.

/s/ Daniel J. Kurowski

Daniel J. Kurowski

Exhibit A



INVOICE #

23158

Issue Date 12/31/2022

Billing Period 12/1/2022 - 12/31/2022

To Patrick F. Madden, Esq. Berger Montague PC 1818 Market Street, Suite 3600 Philadelphia, PA 19103

Via Email pmadden@bm.net

IN RE:	Page 1 of 2
COVID Student Refunds - George Washington Universit	y
20140-000	

Professional Services		Rate	Hrs.	Total
Augustus Urschel, Economist	\$	510	4.5	\$ 2,295.00
Madeleine Bowe, Analyst		310	3.5	1,085.00
Kavya Kalia, Associate Analyst		280	36.0	10,080.00
Logan Summerlin, Associate Analyst		280	4.0	1,120.00
Subtota	l for Prof	essional S	Services	\$ 14,580.00

Total Due \$ 14,580.00

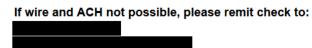
*01/29/23: Payment from Hagens Berman (\$7,290.00)

Balance Remaining: \$7,290.00

TOTAL DUE UPON RECEIPT

PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*

Payme	nt informatio	n:



*When paying via Wire or ACH, please also email receivables@econone.com indicating amount being transferred and the invoice(s) being paid.

COVID Student Refunds - George Washington University 20140-000

Date	Hours	Description // Memo
Augustus Urs	chel	
12/14/2022	0.5	Review materials // Review of tuition and fees.
12/15/2022	2.5	Review materials // Generation of GW survey Kickoff call with client.
12/19/2022	1.5	Review materials // Drafting of survey.

Madeleine Bowe	•	
12/15/2022	1.0	Meeting // Met with Economist to discuss conjoint setup.
12/15/2022	2.2	Review materials // Edited GWU conjoint surveys.
12/20/2022	0.3	Review materials // Reviewed graduate test scores.

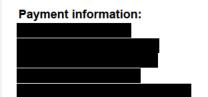
6.0	Research for case
7.0	Research for case
6.0	Research for case
7.0	Research for case
2.0	Research for case
2.0	Research for case
6.0	Draft report
	7.0 6.0 7.0 2.0 2.0

Logan Summerli	n	
12/20/2022	4.0	Data analysis // Auditing data analysis



INVOICE #	IN RE:		Page 1 of 2
23324 COVID Student Refunds - George Washington 20140-000			ty
Issue Date 1/31/2023	This Invoice		Total
Billing Period 1/31/2023	Out-of-Pocket Expenses	\$	13,495.36
	Qualtrics Subscription Fee Share (2 surveys)	\$	6,300.00
To Daniel J. Kurowski, Esq. Hagens Berman Sobol Shapiro LLP 455 N. Cityfront Plaza Drive	Outstanding Invoices		Total
Suite 2410 Chicago, IL 60611	Invoice 23158 (12/31/2022)	\$	7,290.00
	Outstanding Balance	\$	7,290.00
Via Email dank@hbsslaw.com	Total Due	\$	27,085.36

PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*



If wire and ACH not possible, please remit check to:

*When paying via Wire or ACH, please also email receivables@econone.com indicating amount being transferred and the invoice(s) being paid.



INVOICE #	IN RE:		Page 2 of 2
23324	COVID Student Refunds - George Washington Uni 20140-000	versi	ity
Issue Date 1/31/2023			
Billing Period 1/31/2023	Out-of-pocket Expenses		Total
	Survey Consulting Services	\$	13,495.36
Γ ο Daniel J. Kurowski, Esq.	Subtotal for Out-of-pocket Expenses	\$	13,495.36
lagens Berman Sobol Shapiro LLP 55 N. Cityfront Plaza Drive Suite 2410	Qualtrics Subscription Fee Share (2 surveys)	\$	6,300.00
Chicago, IL 60611	Total This Invoice	\$	19,795.36
Via Email dank@hbsslaw.com			
	*03/20/23: Payment from Hagens Berman (\$	9,897	(.68)
	Balance Remaining:	\$3,59	7.68
	TOTAL DUE UPON RECEIPT PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUC		NS BELOW*
	Payment information: If wire and ACH not possible, ple	ase re	emit check to:

*When paying via Wire or ACH, please also email receivables@econone.com indicating amount being transferred and the invoice(s) being paid.

COVID Student Refunds - George Washington University 20140-000





INVOICE #

23620

Issue Date 3/31/2023

Billing Period 3/1/2023 - 3/31/2023

To Daniel J. Kurowski, Esq. Hagens Berman Sobol Shapiro LLP 455 N. Cityfront Plaza Drive Suite 2410 Chicago, IL 60611

Via Email

dank@hbsslaw.com

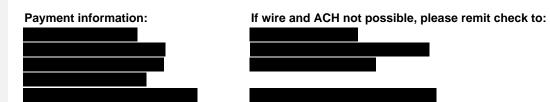
IN RE:	Page 1 of 2			
COVID Student Refunds - George Washington University				
20140-000				

Professional Services		Rate	Hrs.	Total
Augustus Urschel, Economist	\$	560	7.4	\$ 4,144.00
Madeleine Bowe, Analyst		340	0.9	306.00
Kavya Kalia, Associate Analyst		320	6.0	1,920.00
	Subtotal for Profe	essional S	Services	\$ 6,370.00

Total Due \$ 6,370.00

TOTAL DUE UPON RECEIPT

PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*



*When paying via Wire or ACH, please also email receivables @econone.com indicating amount being transferred and the invoice(s) being paid.

03/20/2023

0.9

COVID Student Refunds - George Washington University 20140-000

Date	Hours	Description // Memo
Augustus Urs	schel	
03/20/2023	3.2	Analysis for Case // Survey construction, emails with qualtrics
03/22/2023	1.0	Analysis for Case // Conjoint building.
03/23/2023	0.5	Analysis for Case // Conjoint editing.
03/27/2023	1.2	Analysis for Case // Pretest conjoint data analysis.
03/29/2023	1.5	Analysis for Case // Literature review and respondent interview.
Madeleine Bo	we	

Kavya Kalia		
03/20/2023	3.0	Review materials // Reviewing/editing draft
03/22/2023	3.0	Review materials // Reviewing/editing draft

Meeting // Met with Economist and Analyst to review conjoint survey.

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Page 1 of 3

INVOICE #

23861

Issue Date 4/30/2023

Billing Period 4/1/2023 - 4/30/2023

To Daniel J. Kurowski, Esq. Hagens Berman Sobol Shapiro LLP 455 N. Cityfront Plaza Drive Suite 2410 Chicago, IL 60611

Via Email

dank@hbsslaw.com

	20140-000	D		
Professional Services		Rate	Hrs.	Total
Hal Singer, Managing Director	\$	950	10.0	\$ 9,500.00
Augustus Urschel, Economist		560	29.2	16,352.00
Madeleine Bowe, Analyst		340	9.9	3,366.00
Kavya Kalia, Associate Analyst		320	12.0	3,840.00
Logan Summerlin, Associate Analyst		320	30.2	9,664.00

IN RE:

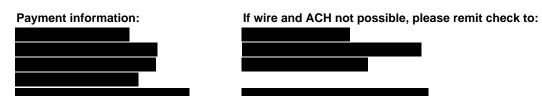
COVID Student Refunds - George Washington University

Subtotal for Professional Services \$ 42,722.00

Total Due \$ 42,722.00

TOTAL DUE UPON RECEIPT

PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*



*When paying via Wire or ACH, please also email receivables @econone.com indicating amount being transferred and the invoice(s) being paid.

COVID Student Refunds - George Washington University 20140-000

Date	Hours	Description // Memo	
Hal Singer			
04/11/2023	3.0	Draft report // Revise draft	
04/29/2023	4.5	Review materials // Review materials for depo	
04/30/2023	2.5	Review materials // Review materials for depo	

Augustus Ursc	Augustus Urschel					
04/03/2023	2.0	Analysis for Case // Survey analysis.				
04/04/2023	1.0	Analysis for Case // Survey results analysis.				
04/05/2023	3.0	Analysis for Case // Results analysis.				
04/06/2023	0.5	Analysis for Case // Drafting of report.				
04/07/2023	1.0	Analysis for Case // Meeting with client.				
04/08/2023	3.2	Analysis for Case // Drafting of report.				
04/09/2023	3.5	Analysis for Case // Drafting of report.				
04/10/2023	7.0	Analysis for Case // Drafting of report.				
04/11/2023	0.5	Analysis for Case // Drafting of report.				
04/12/2023	2.0	Analysis for Case // Drafting of report				
04/13/2023	1.0	Analysis for Case // Drafting of report				
04/17/2023	3.5	Analysis for Case // Submission of report, workpaper creation.				
04/28/2023	1.0	Analysis for Case // Daubert prep.				

Madeleine Bowe						
04/06/2023	0.4	Review materials // Searched for requested data. Reviewed supplied transaction data.				
04/07/2023	0.5	Meeting // Met with Economist and lawyer to discuss conjoint and report. Met with Economist to discuss next steps.				
04/07/2023	0.3	Review materials // Reviewed relevant motion. Wrote notes on next steps.				
04/10/2023	3.5	Draft report // Edited draft and tables.				
04/13/2023	0.1	Review materials // Updated term report table.				

COVID Student Refunds - George Washington University 20140-000

Date	Hours	Description // Memo
Madeleine Bow	ve	
04/14/2023	4.3	Draft report // Reviewed and edited draft.
04/14/2023	0.8	Review materials // Made survey demographics tables.

Logan Summerlin						
04/06/2023	6.5	Data analysis // Data Analysis; Calculating Tuition and Fees				
04/07/2023	7.2	Data analysis // Data Analysis; Calculating Tuition and Fees				
04/10/2023	4.0	Draft report // Drafting report				
04/10/2023	3.5	Review materials // Review Materials				
04/11/2023	3.0	Draft report // Drafting report				
04/11/2023	1.0	Review materials // Review Materials				
04/14/2023	5.0	Review materials // Workpapers				

Kavya Kalia		
04/10/2023	4.0	Draft report // Editing draft- footnotes
04/11/2023	3.0	Draft report // Editing draft
04/14/2023	5.0	Draft report // MRU, footnotes

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INVOICE #

24029

Issue Date 5/31/2023

Billing Period 5/1/2023 - 5/31/2023

To Daniel J. Kurowski, Esq. Hagens Berman Sobol Shapiro LLP 455 N. Cityfront Plaza Drive Suite 2410 Chicago, IL 60611

Via Email

dank@hbsslaw.com

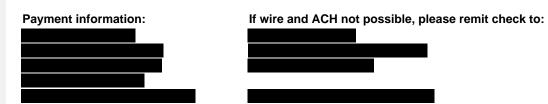
IN RE: Page 1 of 2
COVID Student Refunds - George Washington University
20140-000

	Professional Services		Rate	Hrs.	Total
	Hal Singer, Managing Director	\$	950	8.0	\$ 7,600.00
	Augustus Urschel, Economist		560	4.0	2,240.00
		Subtotal for Profe	essional S	Services	\$ 9,840.00
þ					

Total Due \$ 9,840.00

TOTAL DUE UPON RECEIPT

PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW*



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COVID Student Refunds - George Washington University 20140-000

Date	Hours	Description // Memo	
Hal Singer			
05/01/2023	8.0	Deposition prep // Attend depo	
Augustus Urs	chel		
05/01/2023	1.0	Analysis for Case // Call with Hal.	
05/08/2023	2.5	Analysis for Case // Deposition review and errata.	
05/23/2023	0.5	Analysis for Case // Email to client, student counts.	