

**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,

Plaintiffs,

v.

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

Defendants.

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

**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**

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 ¶ 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.

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:

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

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

/s/ Daniel J. Kurowski  
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

**IN RE:**

Page 1 of 2

**COVID Student Refunds - George Washington University  
20140-000**

**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

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
Subtotal for Professional Services			\$ 14,580.00

**Total Due \$ 14,580.00**

**Via Email**

pmadden@bm.net

\*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\***

**Payment information:**

[Redacted Payment Information]

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

[Redacted Check Remittance Information]

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

IN RE:

COVID Student Refunds - George Washington University  
20140-000



Date	Hours	Description // Memo
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<b>Augustus Urschel</b>		
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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.

<b>Madeleine Bowe</b>		
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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.

<b>Kavya Kalia</b>		
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12/12/2022	6.0	Research for case
12/13/2022	7.0	Research for case
12/14/2022	6.0	Research for case
12/15/2022	7.0	Research for case
12/16/2022	2.0	Research for case
12/19/2022	2.0	Research for case
12/20/2022	6.0	Draft report

<b>Logan Summerlin</b>		
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12/20/2022	4.0	Data analysis // Auditing data analysis
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**Econ One Research**

550 South Hope Street, Suite 800

Los Angeles, CA 90071

Federal Taxpayer ID # [REDACTED]

Inv. # 23158

Page 2 of 2



**INVOICE #**

23324

**Issue Date**

1/31/2023

**Billing Period**

1/31/2023

**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**

<b>This Invoice</b>	<b>Total</b>	
Out-of-Pocket Expenses	\$	13,495.36
Qualtrics Subscription Fee Share (2 surveys)	\$	6,300.00

<b>Outstanding Invoices</b>	<b>Total</b>	
Invoice 23158 (12/31/2022)	\$	7,290.00
Outstanding Balance	\$	7,290.00
<b>Total Due</b>	<b>\$</b>	<b>27,085.36</b>

**PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW\***

**Payment information:**

[Redacted Payment Information]

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

[Redacted Check Remittance Information]

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**INVOICE #**

23324

**IN RE:**

Page 2 of 2

**COVID Student Refunds - George Washington University  
20140-000**

**Issue Date**  
1/31/2023

**Billing Period**  
1/31/2023

**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

Out-of-pocket Expenses		Total
Survey Consulting Services	\$	13,495.36
Subtotal for Out-of-pocket Expenses	\$	13,495.36
Qualtrics Subscription Fee Share (2 surveys)	\$	6,300.00
<b>Total This Invoice</b>	<b>\$</b>	<b>19,795.36</b>

\*03/20/23: Payment from Hagens Berman (\$9,897.68)

Balance Remaining: \$3,597.68

**TOTAL DUE UPON RECEIPT**

**PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW\***

**Payment information:**

[Redacted Payment Information]

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

[Redacted Check Remittance Information]

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

IN RE:



COVID Student Refunds - George Washington University  
20140-000

Date	Employee	Expense Type	Amount	Memo
2023-01-12	,	Survey services	\$ 13,495.36	Survey consultant services

**qualtrics** EXPERIENCE MGMT

**BILL TO**  
ECON ONE RESEARCH, INC. |  
Econ One  
550 S Hope St Ste 800  
Los Angeles CA 90071

**PAYMENT METHODS**

**BANK INFORMATION**  
JPMorgan Chase Bank, NA  
270 Park Ave.  
New York, NY 10010

Account Name: Qualtrics, LLC  
Account Number: 207865283  
ABA Routing for ACH and Check:  
124001545  
ABA Routing for Wire: 021000021  
SWIFT (International): CHASUS33  
Please include the invoice number

**PAPER CHECK**  
VIA USPS  
Qualtrics LLC  
Dept# 880102  
P.O. Box 29650  
Phoenix, AZ 85038-9650

VIA OVERNIGHT COURIER  
JPMorgan Chase (AZ1-2170)  
Attn: Qualtrics, LLC  
Dept #880102  
1820 E. Sky Harbor Circle South  
Phoenix, AZ 85034

**QUALTRICS LLC**  
333 W RIVER PARK DR  
PROVO, UT 84604  
385-203-4024  
invoicing@qualtrics.com  
Tax ID: 45-4964116

**INVOICE**  
#350374  
Date 12/13/2022  
Terms Net 30  
Due Date 1/12/2023

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**DESCRIPTIONS**

Research Services  
Data Collection Sample

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SUBTOTAL **USD \$13,495.36**

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**AMOUNT DUE USD \$13,495.36**

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1 of 1



**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**

<b>Professional Services</b>	<b>Rate</b>	<b>Hrs.</b>	<b>Total</b>
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 Professional Services			\$ 6,370.00
<b>Total Due</b>			<b>\$ 6,370.00</b>

**TOTAL DUE UPON RECEIPT**

**PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW\***

**Payment information:**

[Redacted Payment Information]

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

[Redacted Remit Check Information]

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

IN RE:

COVID Student Refunds - George Washington University  
20140-000



Date	Hours	Description // Memo
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<b>Augustus Urschel</b>		
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03/20/2023	3.2	Analysis for Case // Survey construction, emails with qualtrics
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03/22/2023	1.0	Analysis for Case // Conjoint building.
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03/23/2023	0.5	Analysis for Case // Conjoint editing.
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03/27/2023	1.2	Analysis for Case // Pretest conjoint data analysis.
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03/29/2023	1.5	Analysis for Case // Literature review and respondent interview.
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<b>Madeleine Bowe</b>		
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03/20/2023	0.9	Meeting // Met with Economist and Analyst to review conjoint survey.
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<b>Kavya Kalia</b>		
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03/20/2023	3.0	Review materials // Reviewing/editing draft
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03/22/2023	3.0	Review materials // Reviewing/editing draft
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**Econ One Research**

550 South Hope Street, Suite 800

Los Angeles, CA 90071

Federal Taxpayer ID # [REDACTED]

Inv. # 23620

Page 2 of 2



**INVOICE #**

23861

**IN RE:**

Page 1 of 3

**COVID Student Refunds - George Washington University  
20140-000**

**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

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
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\***

**Payment information:**

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[Redacted Check Remittance Information]

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IN RE:

**COVID Student Refunds - George Washington University  
20140-000**

<b>Date</b>	<b>Hours</b>	<b>Description // Memo</b>
<b>Hal Singer</b>		
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
<b>Augustus Urschel</b>		
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.
<b>Madeleine Bowe</b>		
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.

**Econ One Research**

550 South Hope Street, Suite 800

Los Angeles, CA 90071

Federal Taxpayer ID # [REDACTED]

Inv. # 23861

Page 2 of 3

IN RE:

COVID Student Refunds - George Washington University  
20140-000



Date	Hours	Description // Memo
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**Madeleine Bowe**

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

**Econ One Research**

550 South Hope Street, Suite 800  
Los Angeles, CA 90071  
Federal Taxpayer ID # [REDACTED]



**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 Professional Services			\$ 9,840.00
<b>Total Due</b>			<b>\$ 9,840.00</b>

**TOTAL DUE UPON RECEIPT**

**PLEASE REMIT PAYMENT VIA WIRE OR ACH PER INSTRUCTIONS BELOW\***

**Payment information:**

[Redacted Payment Information]

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

[Redacted Remit Check Information]

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



IN RE:

COVID Student Refunds - George Washington University  
20140-000



Date	Hours	Description // Memo
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**Hal Singer**

05/01/2023	8.0	Deposition prep // Attend depo
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**Augustus Urschel**

05/01/2023	1.0	Analysis for Case // Call with Hal.
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05/08/2023	2.5	Analysis for Case // Deposition review and errata.
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05/23/2023	0.5	Analysis for Case // Email to client, student counts.
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**Econ One Research**

550 South Hope Street, Suite 800

Los Angeles, CA 90071

Federal Taxpayer ID # [REDACTED]

Inv. # 24029

Page 2 of 2