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Case #21CV384151
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Attorneys for Plaintiffs and the Proposed Class

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA**

MAX WEISS, LEZLEY HOLMES,
SEBASTIEN TARDIF, and JOHN
MACZYNSKI, Individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

SUNPOWER CORPORATION,
Defendant.

Case No.: 21-cv-384151

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF
SHANON J. CARSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS'
FEES, COSTS, AND CLASS
REPRESENTATIVE SERVICE AWARDS**

1 I, Shanon J. Carson, hereby declare as follows:

2 1. I am one of the attorneys for Plaintiffs and the Settlement Class in the above-captioned
3 matter.

4 2. I am an Executive Shareholder of Berger Montague PC (“Berger Montague”). I am a
5 member in good standing of the bar of the Commonwealth of Pennsylvania, and I am admitted to the
6 United States District Court for the Eastern District of Pennsylvania and many other district courts
7 throughout the country.

8 3. I am admitted in this Court *pro hac vice* with respect to this matter.

9 4. At the time Plaintiffs filed their Motion for Attorneys’ Fees, Costs, and Class
10 Representative Service Awards on December 10, 2021, Class Counsel’s out-of-pocket expenses were
11 \$38,538.91.

12 5. Since filing that motion, Class Counsel have incurred an additional \$491.02 in filing and
13 miscellaneous fees. Class Counsel’s current out-of-pocket expenses are \$39,029.93.

14 6. Since December 10, 2021, Class Counsel have spent approximately 77 additional hours
15 overseeing administration of the Settlement, addressing inquiries from Settlement Class Members, and
16 preparing Plaintiffs’ Motion for Final Approval of Class Action Settlement. The value of this time is
17 \$47,314.50 at Class Counsel’s ordinary rates.

18 7. To date, Class Counsel’s cumulative lodestar is approximately \$956,956.00. The
19 attorneys’ fee award that Class Counsel has requested, \$1,583,333.33, represents a modest 1.65 multiplier
20 on Class Counsel’s lodestar in this contingent fee case.

21 Dated: March 17, 2022

22 /s/ Shanon J. Carson
23 Shanon J. Carson