

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

TONY LUIB, on behalf of himself and all
others similarly situated,

Plaintiffs,

v.

HENKEL CONSUMER GOODS, INC.,

Defendant.

No. 1:17-cv-03021-BMC

**DECLARATION OF
AMY E. BOYLE IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND
MOTION FOR PAYMENT OF CLASS
COUNSEL'S FEES, EXPENSES AND
PAYMENT OF INCENTIVE AWARD TO
THE CLASS REPRESENTATIVE**

I, Amy E. Boyle, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner at Halunen Law, which, along with Reese LLP and Sultz Law Group, is counsel for Tony Luib in the above-captioned action. I am a member in good standing in the State Bars of Minnesota, Wisconsin, and New York, as well as the federal bars of the United States District Court for the Districts of Minnesota, Western District of Wisconsin, Eastern District of Wisconsin, and District of Colorado, and am admitted *pro hac vice* before this Court.

2. I respectfully submit this Declaration in support of the motion by class representative Tony Luib for Final Approval of the Class Action Settlement and the accompanying motion for payment of Class Counsel's fees, expenses, and payment of an incentive award to the Class Representative. Except as otherwise noted, the facts set forth in this declaration are based in part upon my personal knowledge, and I would competently testify to them if called upon to do so.

3. Class Counsel have been responsible for the prosecution of this Action and for the negotiation of the Settlement Agreement. We have vigorously represented the interests of the Settlement Class Members throughout the course of the litigation and settlement negotiations.

4. As stated more fully in the Declaration of Michael R. Reese in Support of Motion for Final Approval of Class Action Settlement and Motion for Payment of Class Counsel's Fees, Expenses and Payment of Incentive Award to the Class Representative, Class Counsel has expended significant time and effort in pursuing this litigation.

5. A copy of Halunen Law's time and expenses are attached hereto as **Exhibit 1**.

6. The hourly rates in the time records are reflectively of the hourly rates charged by my firm in similar class actions that were granted final approval.

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

Dated: July 9, 2019

HALUNEN LAW

/s/ Amy E. Boyle

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Plaintiff's Counsel

EXHIBIT 1

Purex Summary**Halunen Law Lodestar**

Timekeeper	Title	Hours	Rate	Lodestar
Amy Boyle	Partner	27.5	\$ 485.00	\$ 13,337.50
Charles Moore	Associate	32.7	\$ 430.00	\$ 14,061.00
Christopher Moreland	Partner	0.6	\$ 610.00	\$ 366.00
Colin Pasterski	Associate	4.7	\$ 325.00	\$ 1,527.50
Jennifer Seltz	Paralegal	4.7	\$ 185.00	\$ 869.50
Melissa Weiner	Partner	44.99	\$ 610.00	\$ 27,443.90

Halunen Law Costs

Item	Costs
Legal Process & Delivery Service	\$ 190.00
06/28/17 Filing Fees	\$ 150.00
Copies	\$ 50.00
Travel for 6/13/2018 Mediation	\$ 1,544.12
10/28/18 Filing Fee	\$ 25.00
Lawyer Registration	\$ 53.15
11/28/18 Filing Fees	\$ 300.00
Data Hosting and User Fees	\$ 1,068.15
Total	\$ 3,380.42