

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: LINCOLN NATIONAL COI
LITIGATION

Case No.: 2:16-cv-6605-GJP

**DECLARATION OF RONEN SARRAF FILED ON BEHALF OF SARRAF GENTILE
LLP IN SUPPORT OF MOTION FOR APPROVAL OF COMMON FUND PAYMENT
OF ATTORNEYS' FEES, LITIGATION EXPENSES, AND SERVICE AWARDS**

I, Ronen Sarraf, do hereby declare and state as follows:

1. I am a partner in the law firm of Sarraf Gentile LLP. I submit this declaration in support of my firm's application for an award of attorneys' fees and reimbursement of expenses in connection with the services we rendered in the above-entitled action.

2. The information in this declaration regarding my firm's time and expenses is documented and reflected in time and expense printouts and supporting documentation prepared and maintained by my firm in the ordinary course of business. I am the partner who oversaw and conducted the day-to-day activities in the litigation for my firm, particularly concerning the representation of class plaintiffs Bharti Bharwani and Robert Zirinsky, and I have reviewed these printouts (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation, including the elimination of time that was unnecessary, duplicative, or devoted to matters not directed by Co-Lead Class Counsel. As a result of this review and any adjustments made, I believe that the time reflected in Sarraf Gentile's lodestar calculation and the expenses for which payment is sought as set forth in this declaration are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

3. The number of hours spent on this litigation by my firm is 241.6. A breakdown of the lodestar for *In re: Lincoln National COI Litigation*, No. 16-cv-06605 ("2016 Class Action") is provided in **Exhibit A**. The lodestar amount for attorney time based on the firm's current rates is \$222,030.40. The hourly rates shown in **Exhibit A** are the usual and customary rates set by the firm for each individual attorney. The chart set forth as **Exhibit A** was prepared from contemporaneous daily time records of the firm.

4. Sarraf Gentile's expenses and charges in connection with the prosecution of this litigation total \$1,357.50. Those expenses and charges are summarized by expense category in the attached **Exhibit B**.

5. The following additional information further explains certain of these expenses:


(a) Transportation, Hotels & Meals: \$224.11. In connection with the prosecution of this litigation, the firm has paid for travel expenses to attend, among other things, client meetings and client depositions.

(b) Online Legal and Financial Research: \$1,133.39. These included vendors such as Bloomberg Law and Westlaw. These services were used to obtain access to factual databases, legal research and for cite-checking of briefs. This expense represents the expense incurred by Sarraf Gentile for use of these services in connection with this litigation.

6. The foregoing expenses pertaining to this litigation are reflected in the books and records of Sarraf Gentile. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th of July, 2023 at Great Neck, New York.

A handwritten signature in black ink, appearing to read "Ronen Sarraf", is written above a horizontal line. The signature is cursive and stylized.

Ronen Sarraf

EXHIBIT A

In re: L incoln National COI L itigation, No. 16-cv-06605

In re: L incoln National 2017 COI Rate L itigation, No. 17-cv-04150

TIME REPORT**FIRM NAME: Sarraf Gentile LLP****REPORTING PERIOD: Inception through June 30, 2023**

| Name (Status) | Total Hours | Hourly Rate | Total Lodestar |
|--------------------------|--------------------|--------------------|-----------------------|
| Ronen Sarraf (Partner) | 106.9 | \$919.00 | \$98,241.10 |
| Joseph Gentile (Partner) | 134.7 | \$919.00 | \$123,789.30 |
| TOTALS | 241.6 | | \$222,030.40 |

EXHIBIT B**In re: Lincoln National COI Litigation, No. 16-cv-06605****In re: Lincoln National 2017 COI Rate Litigation, No. 17-cv-04150****EXPENSES REPORT****FIRM NAME : Sarraf Gentile LLP****REPORTING PERIOD: Inception through June 30, 2023**

| DESCRIPTION | EXPENSES |
|-----------------------|-------------------|
| Online research | \$1,133.39 |
| Meals | \$6.11 |
| Transportation | \$218.00 |
| TOTAL EXPENSES | \$1,357.50 |