

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

Carol Kemp-DeLisser, on behalf of herself and all
others similarly situated,

Plaintiff,

vs.

Saint Francis Hospital and Medical Center, Saint
Francis Hospital and Medical Center Finance
Committee, Saint Francis Hospital and Medical
Center Retirement Committee, and John Does 1-20,

Defendants.

Civil Action No. 3:15-cv-01113

DECLARATION OF KEVIN W. COOMBES

KEVIN W. COOMBES declares and states as follows:

1. I am a partner in the law firm of McCarthy, Coombes & Costello LLP, counsel for Plaintiff Carol Kemp-DeLisser and, with Izard, Kindall & Raabe, LLP, interim Class Counsel for the settlement class in this litigation.

2. I submit this Declaration in support of Plaintiffs' motion for approval of the proposed settlement and the motion for an award of attorneys' fees and litigation expenses and application for a Lead Plaintiff award.

3. McCarthy, Coombes & Costello LLP is a litigation firm in Hartford, Connecticut specializing in social security disability, workers' compensation and personal injury law. I have spent my career at the firm advocating for workers with compensation claims and clients seeking to obtain social security disability benefits. I am Board Certified by the Connecticut Bar Association as a Workers' Compensation Specialist. I have practiced law for 40 years in the State of Connecticut. I have tried

countless cases before the Workers' Compensation Commission and in front of the Workers' Compensation Review Board. I am presently an emeritus member of the Workers' Compensation CBA Executive Committee, having served since its inception and have either spoken at or moderated and designed many seminars over the past 30 plus years. Atty. McCarthy has tried over 100 civil jury trials in his career and continues to do so currently. Atty. Costello, also a Board Certified Workers' Compensation Specialist, has spoken at many CBA and CTLA seminars. He has been a member of the Board of Editors of the Workers' Compensation publication Compensation Quarterly for many years and it's Editor in Chief for the past 10 years. Atty. Johns worked at MCC as an Associate Attorney for 2 ½ years.

4. The information in this declaration regarding the firm's time and expenses is taken from contemporaneous time and expense printouts prepared and maintained by the firm in the ordinary course of business. As the partner at my firm who oversaw and conducted the day-to-day activities in the litigation, I reviewed these printouts 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. Based on these reviews, I believe that the time reflected in the firm's lodestar calculation and the expenses for which payment is sought 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.

5. The total number of hours spent on this litigation by my firm through September 8, 2016, is 40.4. The total lodestar amount for attorney time based on the

firm's current rates is \$26,215.00. The hourly rates shown below are the usual and customary rates set by the firm for each individual. A breakdown of the lodestar is as follows:

Attorney	Title	Hours	Hourly Rate	Lodestar
Coombes	Partner	23.5	\$700	16,450.00
Johns	Associate	27.9	\$350	9,765.00
Totals		40.4		26,215.00

6. My firm seeks an award of \$119.00 in travel expenses in connection with the prosecution of the litigation through September 10, 2016. The expenses pertaining to this case are reflected in the books and records of this firm. 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 8th day of September, 2016, at Hartford, CT.

/s/ Keven W. Coombes
KEVIN W. COOMBES