

EXHIBIT 1

**IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA**

THOMAS FUCHS and BROOKE FUCHS,
*individually and on behalf of all others
similarly situated,*

Plaintiffs,

v.

**RÖDL MANAGEMENT, INC. d/b/a RÖDL
& PARTNER,**

Defendant.

Case No. 25EV012126

**DECLARATION OF CLASS COUNSEL IN SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND SERVICE AWARDS**

I, Casondra Turner of Milberg, PLLC, hereby declare, under the penalty of perjury, as follows:

1. I am a senior attorney at the law firm Milberg, PLLC, and I am Settlement Class Counsel in the above-captioned matter. I have personal knowledge of the facts stated in this Declaration except those stated on information and belief and, as to those, I believe them to be true. If called upon, I could and would competently testify to the matters as stated.

2. This Declaration is submitted in support of Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards.

3. The underlying litigation stems from a data security incident impacting Defendant's systems. On or around February 9, 2024, Defendant was alerted that suspicious activity on its network systems was occurring. Defendant subsequently launched an investigation and worked with third-party forensic specialists to determine the full nature and scope of the event. This investigation determined that the unauthorized actor was able to potentially access information

belonging to Plaintiffs and Settlement Class Members in Defendant's systems between approximately January 30, 2024 and February 9, 2024 (the "Data Security Incident").

4. After reviewing the potentially impacted data, Defendant confirmed that certain personally identifiable information, including full names, Social Security numbers, dates of birth, and financial account information was included in the impacted data.

5. Defendant notified Plaintiffs and the Settlement Class about the Data Security Incident on or about April 2, 2025.

6. Upon receiving formal notice of the Data Security Incident, Plaintiff Thomas Fuchs commenced a class action lawsuit in federal court, alleging Defendant failed to sufficiently protect his Private Information.

7. Following the filing of Plaintiff Thomas Fuchs' amended complaint and Defendant's subsequent motion to dismiss the Federal Action, counsel for the Parties began to exchange information as part of informal discovery and discuss resolving the litigation.

8. The Parties engaged in months of arm's-length negotiations and ultimately reached an agreement in principle to settle all claims on a class-wide basis in October 2025, following a mediation with experienced data breach class action mediator Bruce A. Friedman, Esq. of JAMS.

9. As part of the settlement, and in consideration of the arguments regarding federal court jurisdiction raised in Defendant's motion to dismiss, Plaintiffs dismissed the Federal Action and filed the operative Complaint before the State Court of Fulton County in the above-captioned matter. The state court complaint added additional Plaintiff Brooke Fuchs, who also received a notice letter from Defendant.

10. Throughout their settlement discussions, the Parties engaged in a thorough evaluation and discussion of the relevant facts and law, and the Parties carefully considered the

risk and uncertainties of continued litigation and all other factors bearing on the merits of settlement.

11. The proposed Settlement was agreed to following adversarial arm's-length negotiations, supervised by a talented third-party private mediation. The negotiations took place in good faith and without collusion and were conducted by capable and experienced counsel, with full knowledge of the facts, the law, and the inherent risks in the Litigation, and with the active involvement of the Parties

12. Throughout the litigation, Defendant has consistently denied allegations of wrongdoing and liability and has threatened to assert various case dispositive defenses to the claims alleged. Thus, while Plaintiffs and Class Counsel vehemently believe in the merit of the claims asserted, success was far from certain.

13. The Settlement represents an outstanding result for the Settlement Class and provides a comprehensive benefits package for all Settlement Class Members who choose to submit a claim. Specifically, Settlement Class Members who submit a Valid Claim are eligible to receive (1) compensation for documented losses, including up to \$400 in ordinary losses (including up to 4 hours of lost time compensated at a rate of \$20 per hour) and up to \$4,000 in extraordinary losses; or (2) an Alternative Cash Payment of \$50; and (3) three years of single bureau credit monitoring and identity theft insurance.

14. When considering the Settlement benefits together as a whole, the relief made available to the approximately 11,640 Settlement Class Members is substantial. The Settlement has a conservative estimated value of \$4,600,000.00, based upon the \$500,000 in monetary relief available, plus a conservative estimate of the credit monitoring made available (the cost of which will be paid by Defendant outside of the monetary cap). If Settlement Class Members were to

purchase comparable credit monitoring services on their own, they could expect to pay \$9.95 per month or \$119.40 per year.¹ Because the Settlement provides three (3) years of credit monitoring services, this adds an additional value of \$358.20 per Settlement Class Member—**over \$4,100,000.00**. In sum, the Settlement represents an excellent outcome for Plaintiffs and the Settlement Class and reflects the dedication, expertise, and substantial risk undertaken by Class Counsel.

15. As compensation for the substantial benefits conferred to the Settlement Class, Class Counsel seeks a combined award of reasonable attorneys' fees, costs, and expenses in the amount of \$200,000.00² and Service Awards to each of the Class Representatives in the amount of \$2,500.00 (\$5,000.00 in total). These requests are authorized by the Settlement Agreement and were clearly delineated in the notice documents. The requested attorneys' fees, costs, and expenses only equate to approximately 4.5% of a conservative valuation of the Settlement, falling well below the benchmark percentage awarded in cases such as this.

16. This action called for considerable skill and experience, requiring investigation and mastery of complex factual circumstances, the ability to develop creative legal theories, and the skill to respond to a host of legal defenses. Data breach litigation is a cutting-edge area of the law that presents numerous developing issues, evolving precedents, and unpredictable outcomes. Despite these risks, however, Class Counsel undertook this litigation on an entirely contingency fee basis with no promise of any reward.

17. Class Counsel assumed a substantial risk of nonpayment or under compensation in

¹ Compare *Our Products, Equifax Complete*, EQUIFAX, <https://www.equifax.com/personal/products/credit/monitoring-product-comparison/> (last visited June 9, 2026).

² Specifically, Class Counsel requests \$188,657.09 in attorneys' fees and \$11,342.91 in reimbursement for costs and expenses incurred in the litigation.

prosecuting this action. Class Counsel undertook this case with the understanding that compensation would be contingent upon achieving a recovery for Plaintiffs and obtaining Court approval of the requested fees. Like most class actions, this litigation required a significant investment of time and resources, which necessarily diverted counsel from other fee-generating matters involving less risk and complexity. Accordingly, neither compensation for counsel's time nor reimbursement of litigation expenses was guaranteed.

18. This action involved substantial risk, and Plaintiffs faced formidable hurdles if the litigation were to proceed. Continued litigation would entail formal discovery, depositions, expert reports, maintaining class certification through trial, summary judgment, and potential appeals—both interlocutory and post-judgment—each requiring additional rounds of briefing and carrying the risk of no recovery. In contrast, the Settlement ensures meaningful relief for the Settlement Class that prolonged litigation could not guarantee.

19. This exceptional Settlement was only obtained through the experience and skill of Class Counsel. Class Counsel are highly experienced in this area of practice and have a well-respected reputation in the data privacy litigation sector. Class Counsel worked hard and at great risk on behalf of the Settlement Class to obtain information from Defendant regarding the Data Breach and utilized their experience and knowledge gained from other data breach class actions to negotiate a favorable Settlement. The Settlement directly addresses the harms and consequences suffered by Settlement Class Members as a result of the Data Breach and provides substantial compensation to restore them. The complexity of the litigation and the exceptional quality of Class Counsel's work strongly support the requested fee.

20. Class Counsel devoted substantial (but appropriate) time, labor, and resources to achieve the Settlement for the benefit of the Settlement Class. Since inception of the case, Class

Counsel have documented 111.8 hours to date, worth a total lodestar of \$107,992.40. This results in a current lodestar multiplier of 1.74.³ This time does not include preparing the motion for final approval, preparing for the final hearing, supervising the entirety of the claims administration process, nor responding to Settlement Class Member inquiries about their payments after the Settlement receives final approval. These activities will require Class Counsel to accrue additional time and fees and will lower the multiplier.

21. A summary lodestar for Class Counsel and other Plaintiffs' Counsel is included below:

LODESTAR

Timekeeper	Position	Hourly Rate	Hours	Lodestar
David K. Lietz	Sr. Partner	\$1,227.00	18.7	\$22,944.90
Casondra Turner	Sr. Counsel	\$1,019.00	61.6	\$62,770.40
Carolyn Cuneo	Sr. Associate	\$1,019.00	16.2	\$16,507.80
Dean Meyer	Associate	\$625.00	4.4	\$2,750.00
Michelle Benvenuto	Paralegal	\$277.00	3.5	\$969.50
Ashley Tyrrell	Paralegal	\$277.00	1.8	\$498.60
Kendal McLaughlin	Paralegal	\$277.00	0.7	\$193.90
Heather Sheflin	Paralegal	\$277.00	0.6	\$166.20
Sandra Passanisi	Paralegal	\$277.00	1.9	\$526.30
Leslyn Jordan	Paralegal	\$277.00	2.2	\$609.40
Amanda Mkamanga	Paralegal	\$277.00	0.20	\$55.40
TOTAL			111.8	\$107,992.40

EXPENSES

Description	Amount
Filing Fees (federal and state court)	\$650.91
Mediator fees	\$10,500.00
Process Server	\$192.00
TOTAL	\$11,342.91

³ Class Counsel request fees and expenses in the combined amount of \$200,000.00. This is broken down into \$188,657.09 in attorneys' fees and \$11,342.91 in reimbursement for costs and expenses incurred in the litigation. The lodestar multiplier was calculated by dividing the fee request (\$188,657.09) by Class Counsel's combined lodestar (\$107,992.40).

22. In tracking lodestar and expenses in this matter, Class Counsel maintained contemporaneous and detailed time records, which include a description of all work performed and expenses incurred. The hours billed were reasonable and necessary for the prosecution of this case on behalf of Plaintiffs and the Class. The hours and lodestar are minimal for getting a class action case to this stage and were undertaken in a manner to avoid duplication of work.

23. Although Class Counsel consistently sought to keep costs and fees to a minimum, this case required a significant amount of time and effort. This case was levied against a company with counsel experience in data privacy litigation.

24. Class Counsel efforts in this matter include:

- a. fully investigating the facts and legal claims, including interviewing and vetting multiple potential plaintiffs;
- b. obtaining and reviewing documents from Class Members substantiating their claims;
- c. drafting and preparing the complaints (federal and state), as well as conducting extensive research for those complaints;
- d. regularly communicating with the named Plaintiffs to keep them informed of the progress in the litigation;
- e. requesting, obtaining, and/or reviewing information from Defendant regarding the Data Breach;
- f. thoroughly analyzing the strengths and weaknesses of the case;
- g. participating in settlement negotiations with Defendant, including a formal mediation, to reach and finalize the Settlement Agreement, proposed orders,

- and notice documents;
- h. developing the notice program and distribution plan for the Settlement;
- i. soliciting bids from several settlement administrators to ensure the Settlement Class was getting legally compliant notice at a cost-effective price;
- j. obtaining preliminary approval of the Settlement;
- k. aiding Settlement Class Members with questions about the claims process and submitting claims;
- l. conducting research for Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards and subsequently drafting Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards; and
- m. working with the Settlement Administrator to implement the notice program and oversee the claims process.

25. The time and effort invested in this litigation were both necessary and reasonable to achieve the highly favorable Settlement.

26. The hourly rates Class Counsel utilized in this matter are reasonable and are their customary hourly rates for similar data breach class action cases. These hourly rates have been approved by other courts in connection with data breach settlements such as this.

27. Additionally, the reimbursement request of \$11,342.91 for counsel's costs and expenses is for reasonable expenses necessary to prosecute this action. These costs and expenses include: filing fees, service of process, and the cost of the mediator Bruce Friedman, Esq. of JAMS,. Without these expenses, Class Counsel would not have been able to provide the same zealous representation to the Settlement Class. These expenses are typical of this type of litigation, reasonable in amount, and necessary for advancement of the action to the benefit of the Settlement

Class.

28. Class Counsel also seeks Service Awards for the Class Representatives in the amount of \$2,500.00 each. The Class Representatives devoted substantial effort on behalf of the Class, including: (i) completing detailed questionnaires; (ii) providing counsel with critical information to support their claims; (iii) gathering documents and other evidence relevant to the litigation; (iv) agreeing to participate in potentially invasive and time-consuming discovery, including depositions, if required; (v) reviewing pleadings and coordinating with counsel on case strategy and status; (vi) conferring with counsel regarding settlement negotiations; and (vii) carefully considering and approving the Settlement terms on behalf of the Class.

29. Class Counsel have been in communication with their clients since before this action was commenced and remain in contact with them regarding details of this Settlement and its progression. Plaintiffs have been actively involved in this litigation and have approved of and support the Settlement.

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

Executed June 18, 2026, in Albany, Georgia.

/s/: Casondra Turner

Casondra Turner
MILBERG, PLLC
260 Peachtree Street NW
Suite 2200
Atlanta, Georgia 30303
Tel: (866) 252-0878
E: cturner@milberg.com