

ZWERLING, SCHACHTER & ZWERLING, LLP
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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

LINCOLN ADVENTURES, LLC, a Delaware Limited Liability Company, and MICHIGAN MULTI-KING, INC., a Michigan Corporation, on Behalf of Themselves and All Those Similarly Situated, Plaintiffs, vs. THOSE CERTAIN UNDERWRITERS AT LLOYD’S, LONDON MEMBERS OF SYNDICATES, et al., Defendants.	No. 2:08-cv-00235-CCC-JSA CLASS ACTION DECLARATION OF ROBERT S. SCHACHTER FILED ON BEHALF OF ZWERLING, SCHACHTER & ZWERLING, LLP IN SUPPORT OF PLAINTIFFS’ APPLICATION FOR AWARD OF ATTORNEYS’ FEES AND EXPENSES
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I, Robert S. Schachter, declare as follows:

1. I am a partner of Zwerling, Schachter & Zwerling, LLP (“ZSZ”) and one of Plaintiffs’ Co-Lead Counsel in this Action. ZSZ is Co-Lead

Counsel and counsel of record for Plaintiff Michigan Multi-King, Inc. I submit this declaration in support of Plaintiffs' application for an award of attorneys' fees and litigation costs and expenses in connection with the 2025 Partial Class Action Settlement.

2. The 2025 Partial Settlement resolves the claims against Certain Underwriters at Lloyd's, London who are members of Syndicates 727, 2791, 1003, 2003, and 2020 (the "Settling Defendants"). The Settlement Amount is \$3,570,000, consisting of \$375,000 attributable to Syndicate 727, \$745,000 attributable to Syndicate 2791, and \$2,450,000 attributable collectively to Syndicates 1003, 2003, and 2020. The Action continues against the remaining non-settling defendant, Syndicate 2488.

3. Under the Settlement Agreement, Co-Lead Counsel may apply to the Court for an award of attorneys' fees and litigation costs and expenses to be paid from the Settlement Fund. The notice provided to the Settlement Class states that Class Counsel will request attorneys' fees not to exceed one-third of the Settlement Amount and expenses not to exceed \$200,000. The Settlement Agreement further provides that the fee and expense award constitutes the sole aggregate compensation for all Plaintiffs' Counsel with respect to the Settlement and all claims against the Settling Defendants.

4. The information in this declaration regarding ZSZ's time and expenses is taken from time and expense printouts and supporting documentation prepared and/or maintained by the firm in the ordinary

course of business. I am the partner who oversaw and/or conducted the day-to-day activities in this litigation, and I reviewed these printouts and, where necessary or appropriate, the supporting documentation in connection with preparation of this declaration.

5. The purpose of my review was to confirm the accuracy of the entries, as well as the necessity for and reasonableness of the time and expenses committed to the litigation. Reductions have been made where appropriate in the exercise of billing judgment. Based on that review and those adjustments, I believe that the time reflected in ZSZ's lodestar calculation and the expenses for which reimbursement is sought are reasonable in amount and were necessary for the effective and efficient prosecution of this litigation. I further believe that the expenses are of a type normally charged to a fee-paying client in the private legal marketplace.

6. For the period October 16, 2023, through July 31, 2026, after the reductions described above, ZSZ devoted 235.2 hours to this litigation. A breakdown of the lodestar is provided in Exhibit A. The lodestar for attorney and paraprofessional time, based on the firm's current rates, is \$196,112. The hourly rates shown in Exhibit A are the usual and customary rates set by the firm for each individual.

7. For the same period, ZSZ's unreimbursed expenses and charges incurred in connection with the prosecution of this litigation total \$57,109.70 summarized by category in Exhibit B.

8. Since the Court approved the 2023 Partial Settlement, ZSZ has continued actively to prosecute this Action. ZSZ has devoted substantial attorney and staff time to the continuing litigation, including work relating to discovery, motion practice, settlement negotiations and mediation, drafting and negotiating the 2025 Settlement Agreement and related documents, and work necessary to obtain approval and administer the 2025 Partial Settlement.

9. There have now been three partial settlements in this Action, with only one Defendant remaining. Throughout the course of this nearly twenty-year litigation, ZSZ has continued to devote substantial attorney and professional time to the prosecution of the Action and, after the prior fee payments and reimbursements, currently has \$6,957,199 in unpaid lodestar. ZSZ continues to prosecute the Action against the remaining Defendant and continues to incur additional uncompensated attorney time and litigation expenses.

10. The expenses pertaining to this case are reflected in the books and records of ZSZ. Those records are prepared from receipts, expense vouchers, check records, vendor invoices, electronic research records, travel records, and other documents maintained in the ordinary course of business, and they accurately reflect the expenses incurred.

11. The 2025 Partial Settlement was reached after arm's-length negotiations involving Court-appointed mediator the Honorable Layn R. Phillips (Ret.). The Settling Parties accepted mediator proposals and

thereafter negotiated the detailed Settlement Agreement and its exhibits. In my judgment, the \$3.57 million settlement provides a substantial and immediate benefit to the Settlement Class while preserving the Class's claims against the remaining non-settling defendant.

12. The identification and background of ZSZ and its attorneys is attached as Exhibit C. The firm has extensive experience in complex class litigation, including antitrust, RICO, insurance, securities, and consumer cases. ZSZ has served as Co-Lead Counsel in this Action and has participated in the prosecution and settlement of the prior partial settlements as well as the present 2025 Partial Settlement.

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

Executed this 16th day of September, 2026, at Boca Raton, Florida.



EXHIBIT A

ZWERLING, SCHACHTER & ZWERLING, LLP

For the Period October 16, 2023 through July 31, 2026

NAME	HOURS	RATE	LODESTAR
Robert S. Schachter, Senior Partner	105.6	\$995	\$105,072
Justin Tarshis, Senior Counsel	106.1	\$775	\$82,227.50
Jayne C. Nykolyn, Senior Paralegal	5.4	\$375	\$2025
Willie Gonzalez Senior Paralegal	18.1	\$375	\$6,787.50
TOTAL	235.2		\$196,112

EXHIBIT B
ZSZ COSTS RECAP

UNREIMBURSED EXPENSE FOR THE PERIOD OCTOBER 16, 2023, THROUGH JULY 21, 2026	DESCRIPTION	AMOUNT
AF	Airfare / Transportation	\$1,226.10
CT	Court Costs	\$534.00
DB	Database / Online Research	\$35.59
HOTEL	Hotels	\$314.01
LF	Common Litigation Fund	\$40,000
OTHER	Mediator Fees	\$15,000
	TOTAL	\$57,109.70

EXHIBIT C

ZSZ FIRM RESUME

The current Zwerling, Schachter & Zwerling, LLP firm resume filed as Exhibit A to Robert S. Schachter's April 15, 2025, declaration in support of preliminary approval of the (ECF No. 330-2). That resume describes ZSZ's class-action experience, including its role as Co-Lead Counsel in the Lloyd's litigation.