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**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
BALTIMORE DIVISION**

DAVID G. FEINBERG, et al., and all
others similarly situated,

Plaintiffs,

vs.

Case No. 1:17-cv-00427-JKB

T. ROWE PRICE GROUP, INC., et al.,

Defendants.

**DECLARATION OF MATTHEW K. FENTON IN SUPPORT OF PLAINTIFFS' MOTION
FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF
EXPENSES, AND SERVICE AWARDS TO CLASS REPRESENTATIVES**

I, Matthew K. Fenton, declare under penalty of perjury of the laws of the United States:

1. I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses, and Service Awards to Class Representatives.

2. I have personal knowledge of the matters set forth in this Declaration.

3. I am more than 18 years of age and would testify competently to the matters herein if called upon to do so.

4. I graduated from the University of Florida College of Law, with honors, in December, 1993. In addition, I served as a Board Member of the Florida Law Review. Following law school, I worked at the defense firm of Bovol and Vogt, P.A., for fifteen months before becoming the first law clerk to United States Magistrate Judge Mark A. Pizzo. In 1997, I joined the law firm of Gonzalez and Wenzel as an associate. I became a partner in the law firm of Gonzalez, Wenzel & Fenton, P.A. in 1998. I am presently a shareholder in the law firm of Wenzel Fenton Cabassa, P.A.

5. I am the former Co-Chair of the Labor and Employment section of the Hillsborough County Bar Association and am a member of the Labor and Employment section of the Florida Bar. I am also a member of the National Employment Lawyers Association, the Florida chapter of the National Employment Lawyers Association, the Florida Justice Association and the Tampa Bay Trial Lawyers Association. I am a member of the Bar of the Eleventh Circuit Court of Appeals. I have

authored numerous publications on the subject of employment law, including contributing a chapter to the American Bar Association's practice guide "Litigating the Workplace Harassment Case."

6. I have been recognized by my peers for inclusion in every edition of Best Lawyers in America since 2009, have been recognized as a Florida SuperLawyer in labor and employment law every year since 2012, and have been repeatedly selected as a member of the Legal Elite in Employment Law by Florida Trend Magazine. In an announcement released last week, I was named the Best Lawyers in America 2022 Tampa Employment Law – Individuals "Lawyer of the Year." This was my second time receiving this award – the first was in 2016. In 2017, I was the only employee-side attorney selected to the SuperLawyers "Top 50 Lawyers in Tampa Bay." In 2018, 2019, 2020, and 2021, I was selected by my peers as "Top Lawyer – Employment Law (individuals)" in Tampa Magazine.

7. I devote my practice exclusively to matters involving labor and employment law. I have litigated and tried numerous employment cases. I have offered expert testimony in other matters regarding attorneys' fees.

8. During my 28-year career as a lawyer, I have litigated hundreds of cases involving former employees, including under 42 U.S.C. Section 1981 and 1983, Title VII, the ADA, the ADEA, the FLSA, the FMLA, The Florida Civil Rights Act, and the Florida Whistleblower Act.

9. My law firm partner, Brandon J. Hill, also performed work in this case. Mr. Hill has been a member of the Florida Bar since April 27, 2007 (14 years), the Illinois Bar since 2010, and District of Columbia Bar since 2011. He is admitted in the United States District Courts for the Northern, Middle, and Southern District Courts of Florida, the Northern District of Illinois, the Eastern District of Michigan, and the United States Court of Appeals for the Eleventh Circuit.

10. Mr. Hill, like I, has also represented employers and employees in all stages of litigation in federal and state courts throughout Florida, and beyond. In the United States District Court for the Middle District of Florida Mr. Hill served as co-counsel, or lead counsel, in more than 500 cases. Mr. Hill has been appointed as class counsel in more than 40 class action cases.

11. I have fully reviewed my firm's time records reflecting attorney time incurred in this case. Those records accurately reflect the time spent by attorneys at my firm on this case.

12. Based upon my experience, familiarity with rates charged by other lawyers, knowledge of fees awarded in similar litigation, and this Court's Local Rules, I believe the below rates are at or below the prevailing and fair market rates in this District for the services performed by attorneys in my law firm:

Table 2: WFC Lodestar at D. Md. Rates			
Attorneys	Hours	D. Md. Rate	D. Md. Lodestar
Fenton, Matthew K.	6.70	\$ 475	\$ 3,182.50
Hill, Brandon J.	21.65	\$ 350	\$ 7,577.50
Total WFC Lodestar D. Md. Rates	28.35		\$10,760.00

13. In sum, my firm's time records reflect that my firm invested 28.35 billable hours in this case. Applying the above rates, Plaintiffs incurred \$10,760.00 in attorneys' fees as to my firm's time.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed this 8th day of April 2022.

/s/ Matthew K. Fenton
Matthew K. Fenton

Tampa, Florida