

Todd Garber (*pro hac vice*)  
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*Class Counsel*

-----X SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: OCEAN COUNTY  
IN RE CENTRASTATE HEALTHCARE  
DATA SECURITY INCIDENT LITIGATION MASTER FILE: OCN-L-002002-24  
(CBLP)

This Document Relates To:  
All Actions

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**DECLARATION OF TODD S. GARBER IN SUPPORT OF  
MOTION FOR AN AWARD OF ATTORNEY FEES AND EXPENSES**

I, Todd S. Garber, declare as follows:

1. I am a founding partner of the law firm of Finkelstein, Blankinship, Frei-Pearson & Garber LLP (“FBFG”) and one of the Interim Class Counsel appointed by the Court on August 25, 2023 in the class action pending before the Court entitled *In re CentraState Healthcare Data Security Incident Litigation*, Master File No: OCN-L-002002-24 (CBLP).

2. I submit this declaration in support of Plaintiffs’ motion for an award of attorneys’ fees and expenses in connection with the services rendered and costs and expenses incurred in *In re CentraState Healthcare Data Security Incident Litigation*, Master File No: OCN-L-002002-24 (CBLP).

3. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently to the facts contained in this declaration.

4. The schedule attached as **Exhibit A** sets forth my firm's total hours and lodestar, computed at current rates, for the period from the inception of the case through and including August 15, 2024. The total number of hours spent by my first during this period was 190.1 with a corresponding lodestar of \$138,565.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm. The amount does not include the time and expenses after the filing of this brief, such as the time for any response brief, preparation for and attending the Final Approval Hearing, implementing and monitoring the settlement, and answering inquiries from Settlement Class members.

5. In connection with representing Plaintiffs in the action, my firm performed the following work: investigated claims and drafted a complaint; drafted discovery requests and otherwise participated in discovery; researched and drafted motion papers; participated in numerous meetings and calls with defense counsel; researched and drafted a lengthy and detailed mediation statement summarizing the law and evidence; responded to Defendants' mediation statement; participated in mediation and settlement negotiations; and participated in research and drafting of settlement agreement, class notices and motions for approval of the settlement.

6. The lodestar amount reflected in **Exhibit A** for worked performed by attorneys and professional staff at my firm was for the benefit of the Class. The hourly rates for the attorneys and professional staff in my firm reflected in **Exhibit A** are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

7. My firm has expended a total of \$14.55 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception through August 15, 2024. These costs are set forth in the schedule attached as **Exhibit B** and are reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been

reimbursed.

8. FBFG attorneys have successfully litigated complex class actions in federal and state courts all across the country and obtained successful results for clients against some of the world's largest corporations. FBFG attorneys have the requisite knowledge of the substantive and procedural law to prosecute this class action. It is currently litigating dozens of cases in state and federal courts nationwide. It has more than sufficient resources to represent the Class. A sampling of FBFG's more significant past and present cases can be found in the Firm's Resume, attached as **Exhibit C**.

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

Executed on August 19, 2024 in White Plains, New York

FINKELSTEIN, BLANKINSHIP,  
FREI-PEARSON & GARBER, LLP

By: /s/ Todd S. Garber  
Todd S. Garber