

CARELLA, BYRNE, CECCHI, OLSTEIN,
BRODY & AGNELLO, P.C.
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

In re BANK OF NOVA SCOTIA
SPOOFING LITIGATION

No. 3:20-cv-11059-MAS-RLS

CLASS ACTION

This Document Relates To:

ALL ACTIONS.

**DECLARATION OF JAMES E.
CECCHI FILED ON BEHALF
OF CARELLA BYRNE IN
SUPPORT OF APPLICATION
FOR AWARD OF ATTORNEYS'
FEES AND EXPENSE**

I, James E. Cecchi, declare as follows:

1. I am a member of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, PC (“Carella Byrne” or the “Firm”). I submit this declaration in support of the application for an award of attorneys’ fees and expenses/charges (“expenses”) in connection with services rendered in the above-entitled action.

2. This Firm serves as the Court-appointed Court and Government Liaison Counsel in this action for Co-Lead Counsel Nussbaum Law Group, P.C., Scott + Scott Attorneys at Law LLP, Robbins Geller Rudman & Dowd LLP, and Korein Tillery LLC.

3. I oversee my Firm’s submission supporting the request for an award of fees and expenses. The primary lawyers who worked on this case at Carella Byrne include myself, a former partner of the firm, Lindsey H. Taylor, and a former associate of the firm Chirali V. Patel; secondary assistance was also provided by partner Michael A. Innes, associate Kevin G. Cooper, and the support staff of Laura Tempesta, Jeffrey Falduto, and Mary Ellen Rago.

4. The information in this declaration is taken from time and expense reports and supporting documentation prepared and/or maintained by the Firm in the ordinary course of business. The Firm’s time and expenses are recorded on a contemporaneous basis. Carella Byrne’s accounting department reviewed these reports (and backup documentation where necessary or appropriate) in connection

with the preparation of this declaration. Questions regarding time and expenses were directed to me. The purpose of these reviews was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. Based on this review, I believe that the time reflected in the Firm's lodestar calculation and the expenses for which payment is sought herein are reasonable and were necessary for the effective and efficient prosecution and resolution of the litigation.

5. After the review referred to above, the number of hours spent on the litigation by my Firm is 181.40. A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for attorney/paraprofessional time based on the Firm's current rates is \$157,877.50. Exhibit A reflects the current hourly rates the firm submits in class action litigation. The Firm's rates are based on periodic analysis of rates charged by firms performing comparable work both on the plaintiff and defense side. Different timekeepers within the same employment category (*e.g.*, partners, associates, paralegals, etc.) may have different rates based on various factors, including years of practice, years at the Firm, years in the current position (*e.g.*, years as a partner), relevant experience, relative expertise, and the rates of similarly experienced peers at this Firm or other firms. For personnel who are no longer employed by the Firm, the "current rate" used for the lodestar calculation is based upon the rate for that person in his or her final year of employment with the Firm.

6. My Firm seeks an award of \$6,148.15 in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are also summarized on Exhibits B, C, and D.

7. 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 7th day of September, 2023, at Roseland, New Jersey.



JAMES E. CECCHI, ESQ.

EXHIBIT A

ATTORNEY/PARAPROFESSIONAL TIME

In re Bank of Nova Scotia Spoofing Litigation, No. 3:20-cv-11059-MAS-RLS
Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C.
Inception through September 2023

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Cecchi, James	(P)	54.40	\$1,100.00	\$59,840.00
Taylor, Lindsey	(P)	93.50	\$875.00	\$81,812.50
Innes, Michael	(P)	2.10	\$750.00	\$1,575.00
Patel, Chirali	(A)	16.80	\$550.00	\$9,240.00
Cooper, Kevin	(A)	5.00	\$650.00	\$3,250.00
<i>Paralegals</i>				
Falduto, Jeff		1.10	\$225.00	\$247.50
Tempesta, Laura		4.90	\$225.00	\$1,102.50
Rago, Mary Ellen		3.60	\$225.00	\$810.00
<i>TOTAL</i>		181.40		<i>\$157,877.50</i>

(P) Partner

(A) Associate

EXHIBIT B

SUMMARY OF EXPENSES

*In re Bank of Nova Scotia Spoofing Litigation, No. 3:20-cv-11059-MAS-RLS
Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C.
Inception through September 2023*

<i>CATEGORY</i>	<i>AMOUNT</i>
Filing, Witness and Other Fees	\$2,604.40
Mediation Fees (JAMS)	\$3,543.75
<i>TOTAL</i>	<i>\$6,148.15</i>

EXHIBIT C

SUMMARY OF FILING, WITNESS AND OTHER FEES

In re Bank of Nova Scotia Spoofing Litigation, No. 3:20-cv-11059-MAS-RLS
Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C.

Filing, Witness and Other Fees: \$2,604.40

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
9/30/2020	USDC	Filing Fee
9/30/2020	USDC	Filing Fee
9/30/2020	USDC	Filing Fee
9/30/2020	USDC	Filing Fee
10/9/2020	NJDC	Filing Fee
10/16/2020	Guaranteed Subpoena Services	Process of Service
10/16/2020	Guaranteed Subpoena Services	Process of Service
10/16/2020	Guaranteed Subpoena Services	Process of Service
10/16/2020	PACER	Docket Search
10/16/2020	PACER	Docket Search
10/19/2020	PACER	Docket Search
11/16/2020	Guaranteed Subpoena Services	Process of Service
11/16/2020	Guaranteed Subpoena Services	Process of Service
1/18/2021	PACER	Docket Search
1/18/2021	PACER	Docket Search
4/4/2023	PACER	Docket Search
6/30/2023	PACER	Docket Search
6/30/2023	PACER	Docket Search

EXHIBIT D

SUMMARY OF MEDIATION FEES

In re Bank of Nova Scotia Spoofing Litigation, No. 3:20-cv-11059-MAS-RLS
Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C.

Mediation Fees: \$3,543.75

<i>NAME</i>	<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
Cecchi, James	4/8/2022	JAMS, Inc.	For services re: Jed Melnick, Esq., Mediation