

# Exhibit A

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

RONALD McALLISTER,

Plaintiff,

v.

THE ST. LOUIS RAMS, LLC,

Defendant.

Case Nos. 4:16-cv-00172-SNLJ  
4:16-cv-00262  
4:16-cv-00297  
CONSOLIDATED

**DECLARATION OF RICHARD S. CORNFELD**

I, Richard S. Cornfeld, hereby declare as follows:

1. My name is Richard S. Cornfeld. I am an attorney with the Law Office of Richard S. Cornfeld, LLC, and have personal knowledge of the facts stated in this affidavit.

2. I am an attorney of record in *McAllister v. St. Louis Rams, LLC*, No. 4:16-cv-00172-SNLJ, Judge Stephen N. Limbaugh, Jr. presiding (“*McAllister*”).

3. Along with attorneys with The Bruning Law Firm, LLC, and Goldenberg Heller & Antognoli, P.C., I was appointed as Class Counsel to represent the FANS Class in *McAllister*.

4. In prosecuting this case, I have worked closely with the Bruning and Goldenberg firms. Throughout this case, we have avoided needless duplication of effort.

5. The Bruning and Goldenberg firms have provided me with the time they spent on this case, as well as their expenses. That information is incorporated in this Declaration.

6. The following chart summarizes the value of our fees (hours spent times hourly rate) and our expenses through February 28, 2019.

	Fees	Expenses	Total
Bruning Law Firm, LLC	\$850,480.00	\$25,700.17	\$876,180.17
Law Office of Richard S. Cornfeld, LLC	\$753,768.00	\$16,454.38	\$770,222.38

Goldengerg Heller & Antognoli, P.C.	\$753,360.00	\$22,541.26	\$775,901.26
Total	\$2,357,608.00	\$64,695.81	\$2,422,303.81

7. The fees shown in the above table were calculated using the following hourly rates, which are our standard billing rates for complex class actions like this case:

**Bruning firm:** Anthony S. Bruning and Edward M. Roth: \$650; A.J. Bruning and Ryan Bruning: \$400.

**Goldenberg firm:** Mark C. Goldenberg and Thomas P. Rosenfeld: \$650; Kevin P. Green: \$400; Thomas C. Horscroft: \$300.

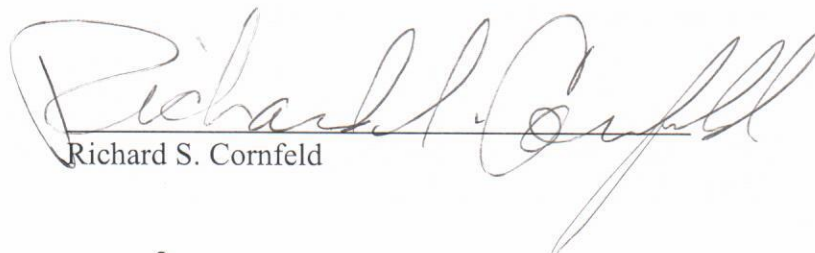
**Cornfeld firm:** Richard S. Cornfeld: \$650; Carolyn Tolbert Frey (paralegal): \$250.

8. All time expended has been reasonably calculated to zealously represent our clients in this case. The Bruning, Goldenberg and Cornfeld firms expect to bill considerably more time as the settlement goes forward to assist PSL holders with their claims and any possible challenges thereto and to seek final approval of the settlement. We cannot predict how much time we will need to expend in these tasks.

9. The expenses that the three firms incurred are itemized in the attached Exhibit 1. These expenses have all been paid in full, with no outstanding balance.

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

Executed on March 15, 2019, in the City of St. Louis, Missouri.

  
Richard S. Cornfeld

# Exhibit 1

## Itemized Expenses

## The Bruning Law Firm, LLC

Date	Memo/Description	Amount
02/19/2016	Service on St. Louis Rams	\$60.12
05/09/2016	Obtain File Documents	\$39.80
04/21/2017	Mediation	\$12.00
04/21/2017	Mediation	\$12.00
04/21/2017	Case Meeting post Mediation	\$169.20
04/21/2017	Mediation Lunch	\$17.25
04/23/2017	Pre-Mediation Meeting	\$12.00
04/24/2017	Courier Service	\$50.00
05/16/2017	Wayback Machine	\$590.00
05/23/2017	Edward Mock Deposition	\$236.20
06/08/2017	McAllister Deposition	\$228.41
06/08/2017	S. Bohm Deposition	\$151.85
06/08/2017	Jaenke Deposition	\$166.40
06/08/2017	Pearlman Deposition	\$182.30
06/08/2017	R. Bohm Deposition	\$197.15
06/08/2017	Cochran Deposition	\$152.75
06/16/2017	LA Flight Early Bird-Demoff Deposition	\$15.00
06/16/2017	Mediation Cost	\$352.49
06/30/2017	LA Flight- Demoff Deposition	\$597.96
07/08/2017	LA Flight Early Bird	\$15.00
07/08/2017	LA Flight Early Bird	\$15.00
07/11/2017	Copying Charge LA Hotel	\$11.50
07/11/2017	Copying Charge LA Hotel	\$63.25
07/11/2017	In Flight Wifi	\$8.00
07/11/2017	LA Trip	\$9.00
07/12/2017	LA Trip	\$8.92
07/12/2017	Copying/Printing Charge LA	\$34.50
07/12/2017	Copying/Printing Charge LA	\$32.31
07/12/2017	Copying/Printing Charge LA	\$23.67
07/13/2017	Airport Parking	\$46.00
07/13/2017	LA Flight-Strombom Deposition	\$10.00
07/14/2017	LA Flight-Strombom Deposition	\$15.00
07/14/2017	LA Flight-Strombom Deposition	\$15.00
07/14/2017	LA Flight-Strombom Deposition	\$190.00
07/14/2017	LA Flight-Strombom Deposition	\$321.00
07/19/2017	LA Flight-Strombom Deposition	\$8.00
07/19/2017	LA Meal	\$17.76
07/19/2017	LA Meal	\$18.30
07/19/2017	LA Meal	\$40.69
07/19/2017	LA Meal	\$18.30
07/19/2017	LA Meal	\$16.96
07/19/2017	LA Meal	\$2.91
07/19/2017	LA Meal	\$151.15
07/20/2017	LA Meal	\$17.30
07/21/2017	LA Flight- Wifi	\$8.00
07/21/2017	Hotal Charge LA Trip-Strombom Deposition	\$819.88
07/21/2017	LA Taxi	\$61.74
07/21/2017	LA Meal	\$199.06
07/22/2017	Parking	\$60.00
09/08/2017	Strombom Deposition and Krieger Bill	\$3,259.23
10/19/2017	Kriegler Expert Fee	\$2,000.00
11/13/2017	Kriegler Deposition	\$348.90
12/15/2017	Kreigler Depo Prep	\$1,709.71
01/12/2018	Demoff Depo Trip	\$15.00
01/12/2018	Demoff Depo Trip	\$15.00
01/12/2018	LA Demoff Depo Trip	\$358.96
01/19/2018	Strombom Deposition	\$1,116.80
01/22/2018	LA-Demoff Depo	\$24.12
01/23/2018	LA-Demoff Depo	\$24.92
01/23/2018	LA-Demoff Depo	\$21.78
01/23/2018	LA-Demoff Depo	\$7.16
01/23/2018	LA-Demoff Depo	\$8.00
01/24/2018	LA- Demoff Depo	\$177.32
01/24/2018	LA-Demoff Depo	\$24.21
01/24/2018	LA-Demoff Depo	\$22.25

01/25/2018	LA-Demoff Depo- Airport Meal	\$40.75
01/26/2018	LA-Demoff Depo	\$568.86
02/26/2018	Strombom Depo	\$684.00
04/13/2018	LA Flight	\$15.00
04/13/2018	LA Flight	\$15.00
04/13/2018	LA Flight	\$379.96
04/16/2018	LA Hotel, Moore Depo	\$756.35
06/04/2018	LA Scanning Services	\$300.00
06/22/2018	Mediation Lunch	\$118.83
06/22/2018	Post Mediation Meeting	\$193.67
06/28/2018	Concord Scanning Services	\$4,298.47
07/09/2018	Reimbursement for Concord Scanning	-\$1,432.82
07/21/2018	Mediation Lunch	\$112.97
08/01/2018	Scanning Hard Files	\$2,028.56
08/01/2018	Kriegler Bill 6/1/18-6/30/18	\$550.00
10/30/2018	Econ One- Brian Kriegler	\$1,720.66
12/21/2018	Mediation Costs	\$715.47
		<b>\$ 25,700.17</b>

## Law Office of Richard S. Cornfeld, LLC

Date	Memo/Description	Amount
02/09/2016	Court Filing Fee	\$400.00
02/16/2016	Process Server	\$54.32
08/30/2016	Parking	\$1.50
04/03/2017	Meal	\$36.17
04/03/2017	Meal	\$36.17
04/13/2017	Miscellaneous	\$9.00
04/21/2017	Parking	\$12.00
04/21/2017	Meal	\$10.18
06/16/2017	Mediation	\$352.49
07/19/2017	Travel/Lodging	\$677.95
07/19/2017	Meal	\$23.67
07/19/2017	Taxi	\$67.98
07/19/2017	Wifi	\$8.00
07/19/2017	Travel/Lodging	\$668.71
07/19/2017	Meal	\$14.54
07/20/2017	Meal	\$31.81
07/21/2017	Travel/Lodging	\$290.00
07/21/2017	Meal	\$32.31
07/21/2017	Wifi	\$63.90
07/21/2017	Meal	\$28.63
07/21/2017	Travel/Lodging	\$31.01
07/23/2017	Parking	\$112.00
07/31/2017	Expert Witness	\$2,029.34
08/08/2017	Court Reporter	\$2,029.35
08/14/2017	Court Reporter	\$215.98
08/16/2017	Office Supplies	\$21.73
08/31/2017	Expert Witness	\$2,000.00
09/06/2017	Court Reporter	\$78.34
01/22/2018	Expert Witness	\$1,116.80
01/26/2018	Expert Witness	\$1,737.00
05/31/2018	Expert Witness	\$1,720.68
06/28/2018	Document Scanning	\$1,432.82
06/30/2018	Expert Witness	\$1,110.00
		<b>\$16,454.38</b>

## Goldenberg Heller &amp; Antognoli, P.C.

Date	Memo/Description	Amount
2/3/2016	Conference Call Charges	\$24.99
4/18/2016	Conference Call Charges	\$13.56
5/9/2017	Pohlman Court Reporting - Richard Arnold	\$226.05
5/23/2017	Transcript of R. Arnold Deposition 5/9/2017	\$226.05
6/26/2017	Mediation Services of the Honorable William Ray Price, Jr. with Armstrong Teasdale, LLP Southwest Airlines - Flight to Los Angeles for the 07/11/2017 Deposition of Rams' Corporate	\$352.49
6/29/2017	Representative, Kevin Demoff	\$612.96
7/9/2017	J. W. Marriott - T. Rosenfeld	\$878.25
7/10/2017	J. W. Marriott - R. Bruning	\$726.63
7/11/2017	Pohlman Court Reporting - Kevin Demoff	\$1,659.29
8/3/2017	FedEx (Subpoena to Beck 'N Call for Service to STL Marketplace, LLC	\$45.50
8/3/2017	Witness Fee to STL Marketplace, LLC	\$45.00
8/4/2017	Beck 'N Call - Process Service [Expedite Service]	\$95.00
8/9/2017	Pacer Service/Federal Court Research (filings in related litigation)	\$15.00
9/6/2017	Econ One (Professional Services - July 2017)	\$2,029.33
9/6/2017	Pohlman Court Reporting - Strombom - Vol I	\$935.61
9/6/2017	Pohlman Court Reporting - Strombom - Vol II	\$215.96
9/6/2017	Pohlman Court Reporting - Strombom - Vol III	\$78.33
10/17/2017	Econ One (Professional Services - August 2017)	\$2,000.00
12/29/2017	Econ One (Professional Services - September 2017)	\$1,709.70
1/11/2018	Strombom Deposition Payment	\$1,116.80
1/23/2018	Airfare to LA for Deposition of Rams' Corporate Representative	\$521.98
1/23/2018	LA Trip - Meal	\$7.50
1/24/2018	Taxi	\$68.70
1/24/2018	LA Trip - Meal	\$23.00
1/24/2018	LA Trip - Meal	\$50.70
1/24/2018	LA Trip - Meal	\$365.98
1/25/2018	LA Trip - Meal	\$241.48
1/25/2018	Lodging (TPR and RB)	\$1,131.51
1/25/2018	Airfare from LA for Deposition of Rams' Corporate Representative	\$467.00
1/26/2018	Taxi	\$33.50
2/5/2018	Jump Drives for video deposition	\$30.24
2/19/2018	Veritext Legal Solutions - Demoff Depo	\$781.00
5/31/2018	Pacer Service/Federal Court Research	\$55.60
6/5/2018	Veritext Legal Solutions - Demoff depo transcript McAllister	\$871.84
6/5/2018	Veritext Legal Solutions - Demoff depo transcript Arnold	\$966.52
6/28/2018	Concord Document Services	\$1,432.82
8/15/2018	Parking Expense-St. Louis Meetings	3.35
8/15/2018	Parking Expense-St. Louis Meetings	\$3.35
8/17/2018	Parking Expense-Clayton Meeting	\$3.00
10/11/2018	Conference Call Charges 9/7/18	\$6.28
10/11/2018	Conference Call Charges 9/26/18	\$10.09
10/29/2018	Expert Fees-Defendant's Expert 5/31/18	\$1,720.66
11/12/2018	Conference Call Charges 10/4/18	\$6.79
12/20/2018	Parking Expense for 12/3/18 Meeting	\$10.05
12/20/2018	Parking Expense for 12/3/18 Meeting	\$3.00
1/22/2019	Parking Expense for 12/11/18	\$3.35
2/6/2019	Mediation Services - J. Price with Armstrong Teasdale	\$715.47
		<b>\$22,541.26</b>
	<b>Total</b>	<b>\$ 64,695.81</b>