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Interim Lead Counsel for Plaintiffs and the [Proposed] Class

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA -
WESTERN DIVISION**

GOOD MORNING TO YOU) Lead Case No. CV 13-04460-GHK (MRWx)
PRODUCTIONS CORP., *et al.*,)
) **DECLARATION OF MARC L.
Plaintiffs,) GODINO IN FURTHER SUPPORT
) OF REQUEST FOR ATTORNEYS'
v.) FEES AND EXPENSES
)
WARNER/CHAPPELL MUSIC,) Room: 650
INC., *et al.*) Judge: Hon. George H. King, Chief
) Judge
Defendants.)
)
)
)**

1 The undersigned, Marc L. Godino, under penalty of perjury, hereby declares
2 and states as follows:

3 1. I am an attorney duly licensed to practice law in the State of California
4 and I am admitted to practice in this Court. I am a Partner of the law firm Glancy
5 Prongay & Murray LLP (“GPM”), one of Plaintiffs’ Counsel in this litigation. I have
6 personal knowledge of the matters set forth herein concerning all matters pertaining
7 to this Action and, if called upon, I could and would competently testify thereto.

8 2. I submit this Declaration in further support of Plaintiffs’ motion for an
9 award of attorneys’ fees and reimbursement of expenses. This motion and
10 supporting memoranda of law are filed concurrently herewith.

11 3. GPM primarily litigates consumer and securities class actions.

12 4. During my more than 10 years at GPM, it has been the firm’s customary
13 practice to include litigation-related travel time as part of the total lodestar submitted
14 to a Court in a request for reimbursement of fees.

15 5. Litigation related travel time is billed at 100% percent of the rate of the
16 attorney billing for such time.

17 6. Litigation related travel time includes such necessary and reasonable
18 time as attending meetings, court appearances, depositions, and travel between
19 activities related to the case.

20 7. To my knowledge, GPM’s requests for litigation related travel time has
21 never been challenged or denied.

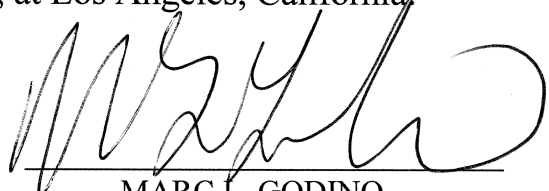
22 8. Prior to joining GPM, I was an associate at the class action firm Stull
23 Stull & Brody (“SSB”) for approximately seven years. During my time at SSB, it
24 was the firm’s customary practice to include litigation-related travel time, billed at
25 100% percent of the rate of the attorney billing for such time, as part of the total
26 lodestar submitted to a Court in a request for reimbursement of fees.

27 9. To my knowledge, SSB’s requests for litigation-related travel time was
28 never challenged or denied during my employment at SSB.

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10. I hereby certify, under the penalty of perjury under the laws of the United States, that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Executed this 11th day of July, 2016, at Los Angeles, California



MARC L. GODINO