

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

Chris Carrigan, Michael Venti, and Sylvain Yelle, individually and as representatives of a class of similarly situated persons, and on behalf of the Xerox Corporation Savings Plan

Plaintiffs,

v.

Xerox Corporation, the Xerox Corporation Plan Administrator Committee, and John Does 1-30

Defendants.

Civil Action No. 3:21-cv-01085-SVN

**DECLARATION OF
JOSHUA R. GOODBAUM
IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES AND COSTS,
ADMINISTRATIVE EXPENSES, AND
CLASS REPRESENTATIVE SERVICE
AWARDS**

I, Joshua R. Goodbaum, declare as follows:

2. I am a partner of Garrison, Levin-Epstein, Fitzgerald & Pirrotti, P.C. I, along with my colleagues at Garrison, Levin-Epstein, Fitzgerald & Pirrotti, P.C., served as local counsel in connection with this class action suit. I submit this Declaration in Support of Plaintiffs' Motion for Approval of Attorneys' Fees and Costs, Administrative Expenses, and Class Representative Service Awards.

3. Garrison, Levin-Epstein, Fitzgerald & Pirrotti, P.C. is a preeminent law firm for the representation of Connecticut employees. All five of our partners are recognized by Connecticut Super Lawyers and Best Lawyers, from which we have received multiple "Lawyer of the Year" honors, and all five partners are also listed among the 500 Leading Plaintiff Employment Lawyers in the United States by Lawdragon – by far the most of any Connecticut law firm. In both 2015

and 2021, the Connecticut Law Tribune named us the Litigation Department of the Year for Employment Law.

4. Although our firm's practice focuses primarily on the representation of employees in individual cases, we also represent groups of employees in class and collective actions. *See, e.g., Borozny v. Raytheon Techs. Corp., Pratt & Whitney Div.*, No. 3:21-cv-1657-SVN (D. Conn.) (Sherman Act); *Kwesell v. Yale Univ.* No. 3:19-cv-1098-KAD (D. Conn.) (disability discrimination); *Williams v. Gen. Nutrition Ctrs., Inc.*, 3:14-cv-1429-VLB (D. Conn.) (unpaid overtime).

5. Our firm represents clients on a variety of fee arrangements. In addition to representing clients for a contingent fee, we also maintain a substantial practice of hourly work for paying clients. The fees reflected in the table below rely on the current billing rates that we regularly charge our paying clients and that our paying clients regularly pay us.

6. To date, our firm has spent a total of 5.4 hours of attorney and staff time on this action, representing a total of \$2,742 at our current billing rates. Based on my knowledge of this case and my firm's role, the time expended was reasonable and appropriate. We anticipate additional hours related to our attendance at the fairness hearing on February 5, 2024.

7. Over the course of the litigation, Garrison, Levin-Epstein, Fitzgerald & Pirrotti, P.C. also has incurred or expects to incur the following expenses in connection with this action:

Expense	Amount
Court Fees	\$1,402.00
Printing/Copying/Shipping	\$29.04
Travel	\$52.78
TOTAL:	\$1,483.82

These expenses were or are necessary to the prosecution of the case and are of the type that would be billed to hourly clients of the firm.

8. Because Garrison, Levin-Epstein, Fitzgerald & Pirrotti, P.C. handled this matter on a contingent fee basis, the firm has not been compensated for any of the foregoing time or expenses.

9. Details and material supporting the time records and expenses referenced in this declaration are available upon the request of the Court.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of November, 2023, at New Haven, Connecticut.



Joshua R. Goodbaum