

United States District Court
Western District of Arkansas
Fayetteville Division

Garland D. Murphy, III, M.D., §
and Phyllis Murphy, §
individually and on behalf of §
all others similarly situated, §

Plaintiffs, §

v. §

Case no. **5:17-CV-5035 ELW**

Gospel for Asia, Inc., §
Gospel for Asia-International, §
K.P. Yohannan, Gisela Punnose, §
Daniel Punnose, David Carroll, §
and Pat Emerick, §

Defendants. §

**Declaration of Marc R. Stanley in Support of Class Counsel’s
Motion for Award of Fees and Expenses from the Common Fund**

Marc R. Stanley hereby states as follows:

1. My name is Marc R. Stanley. I am over twenty-one years of age, of sound mind, have never been convicted of a felony, and am fully competent to make this declaration. I have personal knowledge of the matters addressed herein.

2. I own Stanley Law Group (“the Firm”). I have more than twenty-seven years of experience in complex class action litigation. As a consequence, I am familiar with the amount of attorney and support staff time it takes to pursue this type of litigation, the reasonable hourly billing rates charged by attorneys and support staff with

our qualifications for this type of litigation and the types and reasonable amounts of expenses that reasonably must be incurred in litigation of this type.

3. The Firm served as counsel of record for Plaintiffs and the Class in this action.¹ The role of the Firm in this litigation has been: (a) to act as Class Counsel in this case with full responsibility for and active participation in all aspects of the litigation, including discovery, motion practice, and trial preparation; (b) active consultation and coordination with other Class Counsel in the case; and (c) negotiation and consummation of the settlement of this case.

4. Together with other Class Counsel in this case, the Firm actively litigated this case on behalf of Plaintiffs and the Class beginning in 2016 with the Dickson Litigation. The many tasks the Firm and other Class Counsel performed over this period of time in connection with their services for Plaintiffs and the Class include the issuance of multiple rounds of written discovery requests, service of multiple third-party subpoenas for documents, conduct and defense of dozens of oral depositions, conduct of many informal interviews, meetings, and strategy sessions, review of over one million pages of documents, analysis of significant amounts of data, hiring and consultation with expert witnesses, response to Defendants' discovery requests to Plaintiffs, extensive briefing and oral argument in connection with multiple motions, defense of class certification at the Eighth Circuit, and extensive pretrial preparation.

5. I make this Declaration in support of the Firm's application for an award of attorneys' fees for services in the above-captioned litigation and for reimbursement of expenses reasonably incurred in the course of such representation.

¹ Unless otherwise indicated, all defined terms herein have the same meaning as set forth in the Settlement Agreement and Release on file with the Court [Doc. 207].

6. Based on my personal involvement with virtually every aspect of this case from inception to settlement, I am familiar with all of the work performed by the Firm, and I am of the opinion that all of the hours expended by the Firm in connection with this litigation were reasonably and necessarily incurred. Based on input I have received from other Class Counsel regarding the work they performed in connection with this litigation, and based on my familiarity with the hourly rates charged by the Firm and other Class Counsel for attorneys and support staff, I estimate the total lodestar reasonably and necessarily incurred to date in connection with this litigation to be approximately \$5 million, requiring a multiplier of slightly less than 2.442 to equal the amount of the \$12,210,000.00 Attorneys' Fee award requested by Class Counsel in the Motion this Declaration supports.

7. Attached hereto as Exhibit 1 is a summary indicating the total of \$753,168.87 in unreimbursed expenses incurred by Class Counsel in the prosecution of this litigation. I am familiar with these expenses and the reasons they were incurred, and in my opinion all of these expenses and their amounts were reasonably and necessarily incurred in the prosecution of this litigation. The expenses incurred in this action and reflected on this summary are derived from expense vouchers, check records, and other source materials maintained by the Firm, or from similar materials provided to me by other Class Counsel.

8. I declare under penalty of perjury that the foregoing is true and correct to my knowledge, information, and belief this 10th day of May, 2019.

/s/ Marc R. Stanley
MARC R. STANLEY

Certificate of Service

The undersigned hereby certifies that on May 10, 2019, I electronically filed the foregoing document via the Court's ECF system and notice of this filing was sent via ECF by e-mail to the following counsel of record:

Harriet E. Miers, via email:	hmiers@lockelord.com
Robert T. Mowrey, via email:	rmowrey@lockelord.com
Paul F. Schuster, via email:	pschuster@lockelord.com
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John T. Adams, via email:	jadams@shultslaw.com

/s/ Marc R. Stanley

MARC R. STANLEY

Exhibit 1

Summary of unreimbursed expenses incurred by Class Counsel, by category

Murphy v. Gospel for Asia, Inc., et al., 5:17-cv-5035 ELW

Audio/Video.....	\$10,857.67
Copies.....	\$139.44
Document Management	\$127,882.15
Private Mediation	\$7,000.00
Postage & Delivery	\$387.27
Experts/Professional Fees	\$269,423.80
Research/Investigation	\$266,683.78
Travel	\$47,378.93
Transcription	\$23,415.83
Grand Total.....	\$753,168.87