

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CENTURLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:
Civil Action No. 18-296 (MJD/KMM)

SUPPLEMENTAL DECLARATION OF MICHAEL D. BLATCHLEY

I, Michael D. Blatchley, hereby declare under penalty of perjury as follows:

1. I am a partner in the law firm of Bernstein Litowitz Berger & Grossmann LLP (“Bernstein Litowitz”). I submit this declaration in support of my firm’s request for payment of expenses incurred by my firm in connection with this litigation that were inadvertently not included in our original motion for an award of attorneys’ fees and expenses filed on June 15, 2021. I have personal knowledge of the matters set forth herein.¹

2. My firm, as Court-appointed Lead Counsel in the Action, was involved in all aspects of the prosecution and resolution of the Action, as set forth in the Joint Declaration of Michael D. Blatchley and Keil M. Mueller previously submitted in support of Plaintiffs’ motion for final approval of the Settlement and Plan of Allocation and Lead Counsel’s motion for an award of attorneys’ fees and expenses dated June 15, 2021 (ECF No. 369) (the “Joint Declaration” or “Joint Decl.”).

¹ Unless otherwise defined in this declaration, all capitalized terms have the meanings defined in the Stipulation and Agreement of Settlement dated January 29, 2021, and previously filed with the Court. *See* ECF No. 354-1.

3. My firm incurred \$10,362.50 in expenses in connection with the prosecution of this litigation that were inadvertently not included in the list of expenses for which payment was sought as set forth in the Joint Declaration and the accompanying motion papers submitted on June 15, 2021. These additional expenses are charges for counsel that represented four confidential witnesses (cited in the Complaint as Former Employees (“FE”) FE-1, FE-4, FE-11, and FE-14) who provided important information regarding CenturyLink’s sales and billing practices, including information cited by the Court in its motion to dismiss opinion, and who provided valuable insight into Defendants’ misconduct and guidance in connection with Plaintiffs’ discovery efforts.

4. Inclusion of these expenses brings the total expenses for which Bernstein Litowitz seeks payment in the Action to \$872,329.46 and brings the total expenses for which all Plaintiffs’ Counsel seek payment to \$888,775.83.

5. Attached hereto as Exhibits A, B, and C are revised versions of charts relating to litigation expenses that were submitted with the original Joint Declaration, which have been updated to reflect the additional \$10,362.50 in witness fees. Exhibit A is a revised version of Bernstein Litowitz’s Expense Report (Exhibit 2 to Exhibit 5-A to the Joint Decl.) (ECF No. 369-5 at p. 10); Exhibit B is a revised version of the “Summary of Plaintiffs’ Counsel’s Lodestar and Expenses” (Exhibit 5 to the Joint Decl.) (ECF No. 369-5); and Exhibit C is a revised version of the “Breakdown of Plaintiffs’ Counsel’s Expenses by Category” (Exhibit 6 to the Joint Decl.) (ECF No. 369-6).

I declare, under penalty of perjury, that the foregoing facts are true and correct.

Executed on July 13, 2020.

/s/ Michael D. Blatchley
Michael D. Blatchley

Exhibit A

**REVISED EXHIBIT 2 TO EXHIBIT 5-A TO THE JOINT DECLARATION OF
MICHAEL D. BLATCHLEY AND KEIL M. MUELLER (ECF NO. 369)**

In re: CenturyLink Sales Practices and Securities Litigation
Civil Action No. 18-296 (MJD/KMM)

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

EXPENSE REPORT

Inception through and including July 13, 2021

CATEGORY	AMOUNT
Court Fees	\$138.54
Service of Process and Document Retrieval	\$11,087.18
On-Line Legal and Factual Research	\$196,473.27
Telephone	\$4,316.58
Postage & Express Mail	\$1,162.23
Local Transportation	\$10,943.40
Internal Copying/Printing	\$1,855.70
Outside Copying	\$606.71
Out of Town Travel*	\$22,564.68
Working Meals	\$3,414.87
Court Reporting & Transcripts	\$17,693.91
Experts	\$534,996.41
Mediation Fees	\$18,685.00
Document Management/Litigation Support	\$38,028.48
Witness Fees	\$10,362.50
TOTAL:	\$872,329.46

* This includes hotels in the “higher-cost” cities of Newport Beach, CA, Palo Alto, CA, and San Diego, CA, capped at \$350 per night, and the “lower-cost” city of Minneapolis, MN, capped at \$250 per night.

Exhibit B

**REVISED EXHIBIT 5 TO THE JOINT DECLARATION OF MICHAEL D.
BLATCHLEY AND KEIL M. MUELLER (ECF NO. 369)**

In re: CenturyLink Sales Practices and Securities Litigation
Civil Action No. 18-296 (MJD/KMM)

**SUMMARY OF PLAINTIFFS' COUNSEL'S
LODESTAR AND EXPENSES**

Ex.	FIRM	HOURS	LODESTAR	EXPENSES
5A	Bernstein Litowitz Berger & Grossmann LLP	24,921.00	\$12,132,947.50	\$872,329.46
5B	Stoll Stoll Berne Lokting & Shlachter P.C.	10,560.70	\$4,263,365.25	\$13,213.65
5C	Lockridge Grindal Nauen P.L.L.P.	446.15	\$385,783.75	\$2,161.80
5D	Motley Rice LLC	3,008.95	\$1,104,218.25	\$1,070.92
5E	Nelson, Zentner, Sartor & Snellings, LLC	106.50	\$37,275.00	-----
	TOTAL:	39,043.30	\$17,923,589.75	\$888,775.83

Exhibit C

**REVISED EXHIBIT 6 TO THE JOINT DECLARATION OF MICHAEL D.
BLATCHLEY AND KEIL M. MUELLER (ECF NO. 369)**

In re: CenturyLink Sales Practices and Securities Litigation
Civil Action No. 18-296 (MJD/KMM)

**BREAKDOWN OF PLAINTIFFS' COUNSEL'S
EXPENSES BY CATEGORY**

CATEGORY	AMOUNT
Court Fees	\$710.54
Service of Process and Document Retrieval	\$11,342.90
On-Line Legal and Factual Research	\$197,597.46
Telephone	\$4,318.73
Postage/Express Mail/Hand Delivery Charges	\$1,346.23
Local Transportation	\$10,943.40
Copying/Printing	\$2,787.69
Out of Town Travel	\$31,591.71
Working Meals	\$3,609.07
Court Reporting & Transcripts	\$21,593.71
Experts	\$534,996.41
Mediation Fees	\$18,685.00
Document Management/Litigation Support	\$38,028.48
Courthouse Records Copying	\$862.00
Witness Fees	\$10,362.50
TOTAL EXPENSES:	\$888,775.83