

**IN THE CIRCUIT COURT OF THE 11TH JUDICIAL
CIRCUIT IN AND FOR MIAMI DADE-COUNTY, FLORIDA**

CASE NO.: 2021-015089-CA-01

SECTION: CA43

JUDGE: Michael Hanzman

**IN RE: CHAMPLAIN TOWERS SOUTH
COLLAPSE LITIGATION**

**AMENDED DECLARATION OF COURT APPOINTED CLASS COUNSEL H.K. SKIP
PITA FILED ON BEHALF OF PITA WEBER DEL PRADO IN SUPPORT OF
APPLICATION FOR AWARD OF ATTORNEYS' FEES, COSTS AND EXPENSES**

I, H. K. Skip Pita, declare and state:

1. I am Partner at Pita Weber Del Prado (“PWD”). On July 16, 2021, the Court appointed PWD to the Plaintiffs’ Steering Committee to serve and act on behalf of the Plaintiffs and the proposed class members in this action. I submit this declaration in further support of Class Counsel’s unified Fee Application filed June 12, 2022, and PWD’s request for a share of any award of attorneys’ fees and reimbursement of expenses in connection with the services we rendered in this case. This declaration details my work on this case from June 1, 2022, forward, and supplements PWD’s submissions to the Court in connection with the June 12, 2022, Fee Application.

2. Over the past several months, I and other members of my firm provided legal services to class members in connection with the claims process administered by the Court. These services included preparing claim submissions for class member-claimants, retaining and working with economics expert, reviewing tax returns, conferences with accountant, numerous conferences with clients, conferences with family witnesses, preparing and editing video presentation for the Court, conferences with representatives for related estates, preparing for the damages hearing before the Court, advising class member-claimants on appropriate claims, estate. PWD counseled four class-members throughout this process.

3. The information in this declaration regarding my firm's time and expenses is documented and reflected in time and expense printouts and supporting documentation prepared and maintained by my firm in the ordinary course of business, and which is being submitted directly to the Court for *in camera* review. I am the partner who oversaw the activities in this matter and I have reviewed these printouts (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation, including the elimination of time that was unnecessary or duplicative.

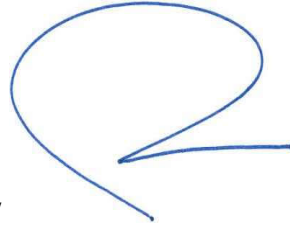
4. The number of attorney hours spent on these matters by PWD from June 1, 2022, until August 25, 2022, is 50.7 for Attorneys and 2.5 for Paralegal, resulting in a lodestar of \$30,420.00 (Attorneys) plus \$375.00 (Paralegal) for total of \$30,795.00. These dollar amounts are based on a lodestar for attorneys at \$600 per hour and paralegals at \$150 per hour. PWD respects the Court's discretion on any appropriate hourly rate or multiplier. In past class action litigation in 2018, Expert Lewis N. Jack opined that \$600 per hour was reasonable for PWD, along with a multiplier of 2.5. Judge Arces awarded fees and the multiplier based on Mr. Jack's representation. See *Alejo v. Nationstar Mortgage, LLC, et al.*, Miami -Dade County, 18-017648 CA 23.

5. Additionally, **PWD** has incurred expenses and charges in connection with the presentation of the individual clients' claims. Those expenses and charges are being provided to the Court *in camera* along with the time sheets relevant to those individual clients.

6. The time and the expenses for which payment is sought as set forth in this declaration are reasonable in amount and were necessary for the effective and efficient presentation of the class members' claims. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace, and are reflected in the books and records of PWD. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26 of June, 2022 at Miami, Florida.

A handwritten signature in blue ink, consisting of a large, stylized loop followed by a horizontal stroke.

/s/

H.K. Skip Pita
FBN 0101974

