

THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY

IN RE: SKECHERS TONING SHOES
PRODUCTS LIABILITY
LITIGATION

Master File No. 3:11-MD-2308-TBR

MDL No. 2308

Honorable Thomas B. Russell

This document relates to:

Grabowski v. Skechers U.S.A., Inc.,
S.D. California, C.A. No. 3:10-01300

Case No.: 3:12-CV-00204-TBR

**DECLARATION OF JOHN F. EDGAR IN SUPPORT OF
MOTION FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, John F. Edgar, hereby state, under penalty of perjury, as follows:

1. I am an attorney in the law firm of Edgar Law Firm, LLC. I am submitting this declaration in support of my firm's application for an award of attorneys' fees in connection with services rendered to the Class and the reimbursement of expenses incurred by my firm in the course of this litigation.

2. As counsel for plaintiffs in this action, the attorneys and other professionals of my firm were involved in the following tasks and activities (summarized) during the course of the litigation: case development: case development/research regarding footwear at issue; participate with co-counsel in drafting, editing, reviewing and analyzing pleadings; research pertaining to federal and California consumer law claims, including causes of action, damages, and other legal issues; assist co-counsel with respect to settlement negotiations; regular communication with client/class representative regarding case, progress, status, discovery, settlement and class

certification issues; participate with co-counsel in the Court's Early Neutral Evaluation (ENE) conference and attend same with client/class representative; participate with co-counsel in discovery, including responses/disclosures by client/class representative, reviewing documents produced by defendant, and defendant witness interviews.

3. Plaintiff Venus Morga served as a responsive and reliable class representative, fulfilling any and all requests and/or demands made upon her during the course of the case. She met in person with counsel on numerous occasions and when requested to respond to inquiries and discovery. In addition, Mrs. Morga was always actively engaged in the case, thereby responding to any and all calls and updates by her counsel. She also responded to discovery requests and provided any and all requested documents/materials in a timely manner. Further, Mrs. Morga, at the request of the Court, attended an ENE conference. In so attending, Mrs. Morga took two days off from her job (without compensation) and traveled from her home in Lodi, California to San Diego, California.

4. The identification and background of Edgar Law Firm LLC and its attorneys is attached hereto as Exhibit A.

5. The schedule attached hereto as Exhibit B is a summary indicating the amount of time spent by each attorney and other professional of my firm who worked on this litigation and the lodestar calculation based on my firm's current billing rates. For attorneys and other professionals who are no longer employed by my firm, but who worked on this litigation, the lodestar calculation is based upon the billing rates for such attorneys and professionals in his or her final year of employment by my firm. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm, which are available at the request of the Court. Time expended in preparing this application for fees and reimbursement of expenses has not been included in this request.

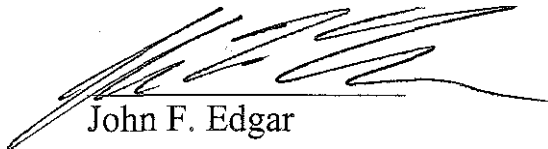
6. The hourly rates for the attorneys and other professionals in my firm listed in Exhibit B are the same as the regular current rates charged for their services in non-contingent matters and/or which have been accepted in other class action litigations.

7. The total number of hours expended on this litigation by my firm is 458 hours. The total lodestar for my firm is \$257,830.00, consisting of \$257,830.00 for attorneys' time and \$0.00 for other professionals' time.

8. My firm's lodestar figures are based upon the firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

9. As detailed in Exhibit C, my firm has incurred a total of \$5,576.46 in unreimbursed expenses in connection with the prosecution of this litigation. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and are an accurate record of the expenses incurred. I declare under penalty of perjury under the laws of the State of Missouri that the foregoing is true and correct.

Executed this 20th day of December, 2012, at Kansas City, Missouri.


John F. Edgar