

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	X	
In re WASTE MANAGEMENT SECURITIES	:	Civil Action No. 1:22-cv-04838-LGS
LITIGATION	:	
	:	<u>CLASS ACTION</u>
	:	
	:	DECLARATION OF DAVID C. HARRISON
	:	IN SUPPORT OF LEAD COUNSEL'S
	:	MOTION FOR AN AWARD OF
	:	ATTORNEYS' FEES AND EXPENSES AND
	:	AWARDS TO LEAD PLAINTIFFS
	X	

I, DAVID C. HARRISON, declare as follows:

1. I am the sole member of the Law Office of David Harrison PLLC (“Harrison Law Office”). I have worked with and under the direction of Court-appointed Lead Counsel, Robbins Geller Rudman & Dowd LLP (“RGRD” or “Lead Counsel”), in the above-captioned class action (the “Action”), initially as a partner at Lowey Dannenberg, P.C. (“Lowey”) and since October 1, 2023 as a member of the Harrison Law Office (together, the “Firms”). I submit this declaration in support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Expenses and Awards to Lead Plaintiffs.

2. I have considerable experience over the past three decades representing individual and institutional investors in complex securities class actions.

3. I was at all relevant times the lead attorney from the Harrison Law Office and Lowey. Based on my personal involvement in this Action and information provided to me by my former colleagues at Lowey, I have knowledge of the matters set forth herein. I believe the information contained herein to be accurate based on my personal knowledge, as well as information provided to me by others.

4. I have reviewed the time and expense records of the Harrison Law Office, and Lowey’s time and expense records have also been reviewed by Lowey, for accuracy, as well as the necessity for and reasonableness of the time and expenses committed to this Action. As a result of this review, certain reductions were made to these records in the exercise of billing judgment. Based on this review (including the reductions made) and information provided, I believe that the time spent by the Firms was reasonable and necessary to prosecute this Action.

5. After the reductions referred to above, I spent 347.50 hours on the prosecution and resolution of this Action from October 1, 2023 through August 26, 2025, the date the Court granted

preliminary approval of the proposed settlement in this Action. Based upon my current hourly rate of \$1,020, the Harrison Law Office's lodestar is \$354,450.

6. Lowey spent 377.8 hours on this Action from inception through October 1, 2023, the date that I departed from Lowey. Lowey's total lodestar during this period is \$369,413.50. A breakdown of the hours, rates, and lodestar of Lowey is as follows:

<i>ATTORNEYS</i>	<i>ROLE^[1]</i>	<i>TOTAL HOURS</i>	<i>HOURLY RATE</i>	<i>TOTAL LODESTAR</i>
Harrison, David	(P)	254.1	\$1,090	\$276,969.00
Farah, Andrea	(SA)	73.2	\$970	\$71,004.00
Goveas, Luke	(A)	18.8	\$525	\$9,870.00

<i>NON-ATTORNEYS</i>				
Lucchesi, Adam	(DA)	20.0	\$365	\$7,300.00
Vogel, Kathy	(PL)	11.7	\$365	\$4,270.50

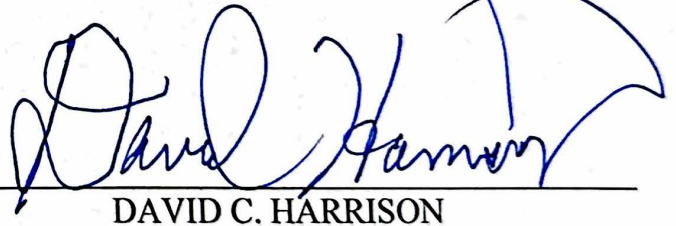
7. The lodestar amount for attorneys and other professional support staff is based on Lowey's 2023 hourly billing rates. The hourly rates for attorneys and other professional support staff are consistent with the hourly rates submitted by Lowey in other securities class action litigation. Lowey's rates are set based on a periodic analysis of rates charged by firms performing comparable work both on the plaintiff and defense side. Each timekeeper listed above is or was a full-time employee of Lowey. For personnel, such as myself, who are no longer working at Lowey, the lodestar calculation is based on the billing rate during the final year of employment with the firm. The time expended and lodestar incurred by Lowey and the Harrison Law Office in connection with gathering and reviewing the information contained in this declaration have been excluded. The lodestars listed for the Firms do not include charges for expense items.

^[1] "P" refers to Partner, "SA" refers to Senior Associate, "A" refers to Associate, "DA" refers to Data Analyst, and "PL" refers to paralegal of Lowey.

8. The work performed by the Firms in connection with the prosecution of this Action included, among other things:

- (a) investigating and researching the claims underlying the Action;
- (b) drafting and commenting on the initial and amended complaints;
- (c) reviewing and editing the briefing on Defendants' motion to dismiss;
- (d) drafting, reviewing, and commenting on discovery requests;
- (e) conferring and collaborating with Lead Counsel regarding the motion to dismiss, class certification discovery, litigation strategy, damages, and settlement negotiations;
- (f) working with Lead Plaintiffs' damages expert on issues such as loss causation and damages;
- (g) attending the depositions of Lead Plaintiffs' expert and Defendants' expert;
- (h) preparing for and participating in the parties' mediation sessions; and
- (i) attendance at the preliminary approval hearing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of November, 2025, in Westport, Connecticut.



DAVID C. HARRISON