

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF KENTUCKY**

CATHERINE DUFFY, MATTHEW	:	
EDLIN, LAWRENCE MULCAHY,	:	
PAULA HALL, individually and on	:	
behalf of all others similarly situated,	:	No.3:24-cv-388-BJB
	:	
Plaintiffs,	:	
	:	
MAZDA MOTOR OF AMERICA, INC.	:	CLASS ACTION
D/B/A MAZDA NORTH AMERICAN	:	
OPERATIONS AND MAZDA MOTOR	:	
CORPORATION,	:	
	:	JURY TRIAL DEMANDED
DEFENDANTS.	:	
	:	

---

**DECLARATION OF KEITH T. VERNON IN SUPPORT OF PLAINTIFFS’  
MOTION FOR ATTORNEYS’ FEES, EXPENSES, AND SERVICE AWARDS**

I, Ketih T. Vernon, declare as follows:

I am a partner at the law firm of Timoney Knox, LLP and a member in good standing of the bars of the District of Columbia, the United States District Court, Northern District of Ohio, and State of Ohio (inactive status). I submit this declaration in support of Plaintiffs’ Motion for Attorneys’ Fees, Expenses, and Service Awards in this action, as memorialized in the Settlement Agreement previously filed with the Court.<sup>1</sup> I make the following declaration based on my own personal knowledge and, if called upon as a witness, I could and would competently testify as follows:

---

<sup>1</sup> Unless otherwise noted, all capitalized terms not separately defined herein have the meaning ascribed to them in the Settlement Agreement. *See* ECF No. No. 18-1.

## **EFFORTS IN THIS LITIGATION**

1. The Settlement, if finally approved, would resolve all claims of Plaintiffs and Settlement Class Members against Mazda and the Released Parties related to an alleged defect in the Mazda Connect infotainment system.

2. Counsel at Timoney Knox, LLP engaged in substantial case vetting and research to fully understand the infotainment center defect and scope of the problem. Counsel participated in numerous conference calls and communications with co-counsel as to matters of the case. Counsel assisted in preparation and drafting of case documents on the initial matter instituted on behalf of Ms. Catherine Duffy. Counsel reviewed the settlement documents and has fielded and continues to be available to field inquiries as to the settlement from class members.

### **CLASS COUNSEL'S REASONABLE LODESTAR AND EXPENSES**

3. Class Counsel have contributed substantial time, expense, and effort pursuing this matter on behalf of Plaintiffs and the Class.

4. To date, my firm has committed 112.10 hours for a lodestar total of \$56,019.00 prosecuting this matter for Plaintiffs and the Class. The hourly rates of counsel and our firm are their customary rates and are consistent with those utilized for lodestar cross-check purposes.

5. The timekeepers at our law firm billed the following from the inception of this case through June 10, 2025.

<b>TIMONEY KNOX LLP – LODESTAR REPORT</b>				
<b>NAME</b>	<b>TITLE</b>	<b>HOURLY RATE</b>	<b>TOTAL HOURS</b>	<b>LODESTAR</b>
Keith Vernon	Partner	\$690/755	44.9	\$31,052.50
Andrew Knox	Associate	\$450/495	38	\$17,158.50
Nolan Finnerty	Associate	\$305	21.1	\$6,435.50
Scott Wolpert	Partner	\$575	.8	\$460.00
Sandra Maliniak	Paralegal	\$125	7.3	\$912.50
<b>TOTAL:</b>			<b>116.90</b>	<b>\$56,019.00</b>

6. This time was kept contemporaneously with billable work as it was performed on the case. Based on our experience in similar cases, I am of the opinion that this time was reasonable and necessary to the prosecution and resolution of a case of this type.

7. To date, my firm has incurred \$334.50 in expenses directly related to and necessary for the prosecution of this matter. These expenses are all the type that would ordinarily be expensed to a fee-paying client in the private litigation sector and are reasonable reflections of the demands of the litigation, including filing fees and legal expenses. In reviewing my firm's detailed time and expenses, I made sure that all time and expenses referenced herein were attributed to this case and do not include any redundancies.

8. From the inception of this case through June 10, 2025, my firm incurred the following litigation expenses:

TIMONEY KNOX LLP – FIRM EXPENSES	
CATEGORY NAME	TOTAL EXPENSES PER CATEGORY
Filing Fees	300.00
Professional Legal Services	34.50
<b>TOTAL:</b>	<b>\$334.50</b>

9. The above expenses were necessary to the effective prosecution of the case and are of the type that are ordinarily billed by attorneys to paying clients in the marketplace. They are reflected in the books and records at our firms. Detailed records of our time and expenses are available to the Court *in camera* upon request.

**THE CLASS REPRESENTATIVE SERVICE AWARDS**

10. I believe the proposed service awards for the Class Representatives in the amounts of \$4,000 to Catherine Duffy and \$2,500 to each Matthew Edlin, Lawrence Mulcahy, and Paula Hall are fair and are reasonable given my knowledge of the case and my professional experience with Class Action matters.

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

Executed this 10<sup>th</sup> day of June, 2025, in the District of Columbia.

A handwritten signature in black ink, appearing to read 'KTV' followed by a horizontal line.

---

Keith T. Vernon