

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JONATHAN CORRENTE, CHARLES
SHAW, and LEO WILLIAMS, each
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

THE CHARLES SCHWAB CORPORATION,

Defendant.

Case No. 4:22-cv-470-ALM

Hon. Amos L. Mazzant, III

**DECLARATION OF CHRISTOPHER BURKE IN
SUPPORT OF PLAINTIFFS' COUNSEL'S MOTION FOR AN AWARD
OF ATTORNEYS' FEES, LITIGATION EXPENSES, AND SERVICE AWARDS**

Pursuant to 28 U.S.C. § 1746, I, Christopher Burke, declare:

1. I am currently a partner in the law firm of Burke LLP. I am one of the Court-appointed class counsel for the Settlement Class. I submit this Declaration in support of Plaintiffs' Counsel's Motion for an Award of Attorneys' Fees, Litigation Expenses, and Service Awards. I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

2. I was a partner at Korein Tillery PC from November 2022 through December 2024, during which I actively represented plaintiffs in this case and oversaw all aspects of the litigation and its settlement. On January 1, 2025, I founded my own firm, Burke LLP. My current firm continues to represent plaintiffs in this matter alongside attorneys from Korein Tillery PC and Bathaee Dunne LLP.

3. While at Burke LLP, my colleagues and I participated in negotiating and drafting the settlement agreement in this Action, securing preliminary approval, coordinating with the

Claims Administrator to develop the notice plan, and assisting Settlement Class Members with questions regarding the settlement. As court appointed class counsel for the Settlement Class, I personally responded to scores of telephone and email inquiries from Settlement Class Members.

4. The specifics of the work performed by my firm and me are set forth in the concurrently filed Yavar Bathaee Declaration in Support of Plaintiffs' Counsel's Motion for an Award of Attorney's Fees, Litigation Expenses, and Service Awards.

5. The schedule attached as Exhibit A summarizes the time expended by Burke LLP attorneys and professional support staff who participated in this Action, along with the corresponding lodestar calculation based on the firm's current billing rates.¹

6. As of June 30, 2025, Burke LLP has spent 230.3 hours prosecuting this case. The total lodestar is \$291,115.

7. The schedule in Exhibit A is prepared from contemporaneous electronic time records maintained by the firm in the ordinary course of business. Time entries associated with the January 24, 2025 fee mediation before Judge Atlas, as well as those related to the preparation of the application for attorneys' fees and reimbursement of litigation expenses, have been excluded. Additionally, all time after June 30, 2025—including anticipated time related to assisting Settlement Class Members and overseeing the design and implementation of Schwab's antitrust compliance program—has been omitted.

8. As detailed in Exhibit B, my firm has incurred a total of \$590.72 in litigation expenses in connection with this Action through June 30, 2025.

¹ The time billed by me and my colleague, Yifan (Kate) Lv, during our tenure at Korein Tillery are included in Korein Tillery's submission, calculated based on our respective hourly rates at that time.

9. The expenses incurred in connection with this Action are documented in my firm's books and records, which are prepared based on bank statements, check records, and other source materials. These records accurately reflect the expenses incurred.

10. My firm has reviewed the underlying time and expense records supporting this declaration to identify and correct any billing errors.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 17, 2025, in San Diego, California:

/s/ Christopher Burke

Exhibit A

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Burke LLP

TIME REPORT

Through June 30, 2025

| Time Keeper | Position | Rate | Hours | Lodestar |
|--------------------|-----------------|-------------|--------------|------------------|
| Burke, Christopher | Partner | \$1,500 | 146.2 | \$219,300 |
| Lv, Yifan (Kate) | Partner | \$1,000 | 55.3 | \$55,300 |
| Stemen, Robin | Of Counsel | \$800 | 14.3 | \$11,440 |
| Tan, Siru | Legal Analyst | \$350 | 14.5 | \$5,075 |
| | | | 230.3 | \$291,115 |

Exhibit B

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Burke LLP

EXPENSE REPORT

Through June 30, 2025

| Expense Category | Amount |
|-------------------------|-----------------|
| Court Fees | \$27.10 |
| Internal Copying | \$63.30 |
| Online Research | \$224.93 |
| Telephone | \$103.26 |
| Travel & Meals | \$172.13 |
| Total | \$590.72 |