

**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 CHAD E. BELL IN SUPPORT
OF PLAINTIFFS' COUNSEL'S MOTION FOR AN AWARD
OF ATTORNEYS' FEES, LITIGATION EXPENSES, AND SERVICE AWARDS**

I, Chad E. Bell, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am one of the attorneys principally responsible for handling this matter. I submit this Declaration in support of Plaintiffs' Motion for Attorneys' Fees and Litigation Costs.

2. I am personally familiar with the facts set forth in this Declaration. If called as a witness, I could and would competently testify to the matters stated herein. I have reviewed the underlying time and expense records supporting this declaration to identify and correct any billing errors.

3. I am a partner at the law firm of Korein Tillery, LLC (hereafter "Korein Tillery"). Our firm regularly works on some of the most complex cases in the country (in both class and non-class cases) and has been appointed as class counsel in over 50 class actions.

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

5. As of June 30, 2025, Korein Tillery has expended 7,434.30 hours prosecuting this case. In Exhibit A, I have attached a chart summarizing the number of hours worked by each attorney and staff member of the firm, along with the billing rates.¹ The chart reflects contemporaneous computerized time records that the firm maintains in the ordinary course of business. All time related to the separate January 24, 2025 fee mediation before Judge Atlas, as well as all time after June 30, 2025 (including future time to be incurred related to monitoring and reviewing the design and implementation of Schwab's antitrust compliance program) has been omitted.

6. The billing rates provided in Exhibit A are the rates charged by Korein Tillery as of June 2025. Stephen Tillery, as the managing partner of the firm, set these rates. Based on our experience, research, and discussions with attorneys at other firms who work in complex litigation (including antitrust matters such as this one), we believe the rates are reasonable and in line with rates charged for similar work by professionals with similar levels of experience and comparable reputations.

7. While I and other Korein Tillery partners did a significant amount of work and ultimately oversaw all work being performed in this matter, we also ensured adequate but non-redundant staffing, and worked to achieve efficiencies whenever possible. We ensured that staff attorneys performed a substantial amount of work related to document review and discovery, and conducted proceedings virtually (including depositions) to decrease the time and costs.

¹ Korein Tillery's submission includes time billed by Christopher Burke and Yifan (Kate) Lv when they were attorneys with Korein Tillery. In January 2025, Christopher Burke and Yifan (Kate) Lv departed Korein Tillery and established Burke LLP. Since that time, they have continued to represent the Plaintiffs and the Settlement Class in this Action.

8. Considering the complexity and novelty of the case, Korein Tillery expended a very reasonable number of hours to achieve this successful settlement. The billed time to this matter results in a lodestar of approximately \$3,886,120.

9. To date, Korein Tillery has incurred \$653,571.73 in litigation costs, as summarized in the chart attached as Exhibit B to this declaration.

10. The costs reflect the usual and customary charges for the expenses incurred and are reflected in the firm's records. These records are prepared from check records, receipts, and other source materials. The costs have not been reimbursed from any other source and are of the type that would have been billed to the client if this had been a non-contingency matter.

11. Some of the larger expenses include:

- (a) Research expenses, primarily from Westlaw and PACER (incurred when searching for and pulling copies of filings in other federal court matters that counsel deemed relevant).
- (b) Expert Services. This case required a substantial amount of work by Professor Macey, Professor Singer, Mr. Tatos, and their teams. Based on work that our firm has done in other complex cases, I am of the opinion that the amount billed by these experts was reasonable and necessary, directly benefited the class, and is of the type that would be billed to a client.
- (c) Travel. Travel in this case was limited, but there were costs incurred to travel for the ultimately successful mediation of this matter.
- (d) Depositions/Transcripts. The firm incurred the costs on transcripts from depositions and court proceedings.

(e) E-Discovery. The firm incurred costs related to the discovery platform used for electronic records.

12. For these reasons, the attorneys' fees requested are reasonable, and the costs expended are reasonable. We respectfully request that the Court grant them.

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

Executed on July 17, 2025 in Chicago, Illinois:

/s/ Chad E. Bell

EXHIBIT A

Korein Tillery LLC
Lodestar through June 30,
2025

Corrente, et al. v. The Charles Schwab Corporation - EDTX 4:22-cv-470

Time Keeper	Position	Rate	Hours	Lodestar
Bell, Chad	Partner	\$ 900.00	551.40	\$ 496,260.00
Burke, Christopher	Partner	\$ 1,400.00	359.80	\$ 503,720.00
Noss, Walter	Partner	\$ 1,200.00	189.20	\$ 227,040.00
Tillery, Stephen	Partner	\$ 1,750.00	4.90	\$ 8,575.00
Wallenstein, Marc	Partner	\$ 1,200.00	10.90	\$ 13,080.00
Craig, John	Associate	\$ 850.00	32.50	\$ 27,625.00
Lv, Kate	Associate	\$ 800.00	240.10	\$ 192,080.00
Ijaz, Anita	Staff Attorney	\$ 400.00	2,192.45	\$ 876,980.00
Stambaugh, Susan	Staff Attorney	\$ 400.00	1,677.89	\$ 671,156.00
Williams, Trevor	Staff Attorney	\$ 400.00	2,098.26	\$ 839,304.00
Clerkin, Stephanie	Director of Litigation Support	\$ 500.00	1.40	\$ 700.00
Epperson, Megan	Paralegal	\$ 400.00	44.40	\$ 17,760.00
Karoomi, Maryana	Paralegal	\$ 400.00	19.10	\$ 7,640.00
Mody, Akshay	Legal Analyst	\$ 350.00	12.00	\$ 4,200.00
			7,434.30	\$ 3,886,120.00

EXHIBIT B

Korein Tillery LLC

Corrente, et al. v. The Charles Schwab Corporation - EDTX 4:22-cv-470

Expense Summary

Research	\$ 2,261.70
Postage/Shipping	\$ 128.16
E-Discovery	\$ 44,567.05
Record Duplication	\$ 576.75
Travel, Lodging, Meals, etc.	\$ 2,884.73
Expert Services	\$ 596,547.81
Court Costs	\$ 962.00
Depositions/Transcripts	\$ 5,623.70
Phone/Conference Calls	\$ 19.83
Total Expenses	\$ 653,571.73