

**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 ELIZABETH L. DERIEUX 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, Elizabeth L. DeRieux, declare:

1. I am currently a partner in the law firm of Capshaw DeRieux LLP. I am one of the counsel representing 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. The specifics of the work performed by my firm and me are set forth in the concurrently filed Declarations of Yavar Bathaee and Christopher Burke in Support of (a) Plaintiffs' Motion for Final Approval of Settlement Agreement and (b) Plaintiffs' Counsel's Motion for an Award of Attorneys' Fees, Litigation Expenses, and Service Awards.

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

4. As of June 30, 2025, Capshaw DeRieux LLP has spent 41.4 hours prosecuting this case. The total lodestar is \$21,330.00.

5. The schedule in Exhibit 1 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.

6. As detailed in Exhibit 2, my firm has incurred a total of \$1,229.69 in litigation expenses in connection with this Action through June 30, 2025.

7. 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.

8. 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 Gladewater, Texas:

/s/ Elizabeth L. DeRieux

Exhibit 1

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Capshaw Derieux LLP

TIME REPORT

Through June 30, 2025

Time Keeper	Position	Rate	Hours	Lodestar
Elizabeth L. DeRieux	Partner	\$700.00	26.1	\$18,270.00
Heidi Peterson	Paralegal	\$200.00	15.3	\$3,060.00
TOTAL			41.4	\$21,330.00

Exhibit 2

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EXPENSE REPORT

Through June 30, 2025

Expense Category	Amount
Mailing	\$92.93
Photocopying/Printing	\$172.28
Travel	\$964.48
Total	\$1,229.69