

**UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII**

STEPHEN G. AQUILINA and LUCINA J. AQUILINA, Individually and on Behalf of All Others Similarly Situated; and DONNA J. CORRIGAN and TODD L. CORRIGAN, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

CERTAIN UNDERWRITERS AT LLOYD'S LONDON; LLOYD'S SYNDICATE #2003; LLOYD'S SYNDICATE #318; LLOYD'S SYNDICATE #4020; LLOYD'S SYNDICATE #2121; LLOYD'S SYNDICATE #2007; LLOYD'S SYNDICATE #1183; LLOYD'S SYNDICATE #1729; LLOYD'S SYNDICATE #510; BORISOFF INSURANCE SERVICES, INC. d/b/a MONARCH E&S INSURANCE SERVICES; SPECIALTY PROGRAM GROUP, LLC d/b/a SPG INSURANCE SOLUTIONS, LLC; ALOHA INSURANCE SERVICES, INC.; ILIKEA LLC d/b/a MOA INSURANCE SERVICES HAWAII; and DOES 1-100,

Defendants.

No. 1:18-cv-00496-ACK-KJM

Trial Judge: J. Michael Seabright
Hearing Date: August 15, 2022

**SUPPLEMENTAL DECLARATION OF DARYL F. SCOTT IN SUPPORT
OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, LITIGATION
EXPENSES, AND SERVICE AWARDS**

I, Daryl F. Scott, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a partner with the law firm Scott+Scott Attorneys at Law LLP (the “Firm”). I submit this supplemental declaration (the “Declaration”) in support of Plaintiffs’ Motion for Attorneys’ Fees, Litigation Expenses, and Service Awards (the “Fee Application”) in the above-captioned action (the “Litigation”).

2. The Firm served as Class Counsel and participated in all aspects of the Litigation, including settlement negotiations. The Firm’s participation is described in Class Counsel’s memorandum of law in support of the Fee Application.

3. The Firm incurred certain expenses to conduct the Litigation. These expenses are supported by the Firm’s accounting records, which were prepared by my staff and reviewed by me.

4. I believe the expenses are accurate and were reasonable and necessary for the effective prosecution of the Litigation. They are expenses typically charged to, and paid by, fee paying clients. If an expense appeared excessive or inappropriate, it was reduced or removed.

5. The expenses I submit for reimbursement are restated to include an estimate of the cost to attend the Final Approval Hearing. The restated expenses total \$227,473.16 and are set forth below:

EXPENSE	AMOUNT
Filing, Witness and Other Fees	\$ 4,293.00
Discovery Platform	\$ 42,245.28
Work-Related Transportation, Hotels & Meals	\$ 17,721.15
Long-Distance Telephone, Facsimile & Conference Calling	\$ 347.66
Messenger, Overnight Delivery, Postage	\$ 1,558.06
Litigation Support	\$ 2,479.00
Duplicating - photocopies	\$ 8,285.54
Online Legal and Factual Research	\$ 21,698.65
Local Counsel	\$ 6,250.79
Local Counsel leading up to final approval	\$ 4,250.00
Experts	\$ 78,562.31
Court Reporters/Transcripts	\$ 39,684.81
Staff Overtime	\$ 82.26
Supplies	\$ 14.65
TOTAL	\$ 227,473.16

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

Executed this 11th day of July, 2022 in Richmond, Virginia.



Daryl F. Scott

Counsel for Plaintiffs and Class Counsel

CERTIFICATION OF SERVICE

I hereby certify that on July 11, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

s/ Joseph P. Guglielmo

Joseph P. Guglielmo