

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

DENIS MARC AUDET, MICHAEL
PFEIFFER, and DEAN ALLEN SHINNERS,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

STUART A. FRASER, GAW MINERS,
LLC, and ZENMINER, LLC, (d/b/a ZEN
CLOUD),

Defendants.

Case 3:16-cv-00940

Hon. Michael P. Shea
Courtroom 2

CLASS ACTION

**DECLARATION OF RUSSELL F. RENNIE IN SUPPORT OF
PLAINTIFFS' MOTION TO AUTHORIZE DISTRIBUTION OF NET SETTLEMENT
FUNDS TO CLAIMANTS AND REIMBURSEMENT OF SETTLEMENT
ADMINISTRATION AND CLASS COUNSEL EXPENSES**

I, Russell F. Rennie, declare and state as follows:

1. I am an attorney at Susman Godfrey L.L.P.
2. Susman Godfrey L.L.P. is Court-appointed Class Counsel for Plaintiffs in the above-captioned action.
3. I submit this declaration in support of Plaintiffs' Motion to Authorize Distribution of Net Settlement Funds to Claimants and Reimbursement of Settlement Administration and Class Counsel Expenses.
4. On September 4, 2024, Huntington National Bank, the escrow agent for the Settlement Fund, reported to Class Counsel that, as of September 4, 2024, the Settlement Fund contained \$1,384,031.96.

5. The Court previous approved the reimbursement of \$954,896.69 in litigation-related expenses for Susman Godfrey L.L.P. *See* ECF No. 395 at ¶ 3.

6. Since Susman Godfrey filed its motion for reimbursement of expenses on May 10, 2023, it has incurred an additional \$11,629.01 in expenses relating to this lawsuit, as detailed and categorized in the below schedule. These expenses were reasonably necessary to the prosecution of this action, and are of the type that Susman Godfrey normally incurs in litigation.

Expense Category	Cumulative Expenses
Document Review Hardware/Hosting	\$2,343.17
Expert/Consultants utilized in conjunction with reviewing audited claims	\$8,075.00
Research/Westlaw	\$694.84
Travel to fairness hearing	\$516.00
Total Expenses	\$11,629.01

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

Executed on September 5, 2024 in New York, New York



Russell F. Rennie