
EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LORI BILEWICZ, *et al.*,)
and all others similarly situated,)
)
Plaintiffs,) Civil Action No. 13-10636-DJC
vs.)
)
FMR LLC; FMR LLC INVESTMENT)
COMMITTEE;)
and John and Jane Does 1-25,)
)
Defendants.)

AIDEN YEAW, ALEX C. BROWN,)
and all others similarly situated,)
)
Plaintiffs,) Civil Action No. 14-10035-DJC
vs.)
)
FMR LLC; FMR LLC RETIREMENT)
COMMITTEE;)
and John and Jane Does 1-25,)
)
Defendants.)

DECLARATION OF PETER MOUGEY IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF REASONABLE ATTORNEYS' FEES AND COSTS

I, Peter Mougey, declare as follows:

1. I am an attorney licensed to practice in the state of Florida and am admitted *pro hac vice* to the District of Massachusetts for the above consolidated Actions (the “Actions”). I am a Shareholder with the law firm of Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A. (“LP”). I have personal knowledge of the facts stated in this declaration. I submit this declaration in support of Plaintiffs’ request for attorneys’ fees, as set forth in Plaintiffs’ motion for an award of reasonable attorneys’ fees.

2. My firm is counsel of record and one of four firms representing the Plaintiffs in the Actions. A firm profile, including a description of the background, experience and qualifications of the firm’s attorneys having primary responsibility for working on this case, was previously submitted to the Court as Exhibit B to the Declaration of Gregory Y. Porter in support of Plaintiffs’ motion for an order preliminarily approving the Settlement and related relief. (Dkt. No. 54-2). By order dated July 10, 2014 (Dkt. No. 59), this Court appointed Plaintiffs’ counsel, including LP and its attorneys of record, Class Counsel for the Settlement Class.

3. In the prosecution of the Actions, LP and the other firms representing Plaintiffs maintained a “co-lead” relationship and shared responsibility for the various activities and projects that were undertaken before bringing the case to proposed resolution through the Class Settlement. During the course of the litigation, LP took care to avoid duplication of efforts and unnecessary work on the case. LP has not included time spent on the fee petition in its summary.

4. The total number of hours expended on this litigation by my firm through August 21, 2014 is 518.80 hours. The total lodestar for my firm, based on the hourly rates in effect at the time the work was performed, is \$203,942.50.

5. The summary billing report for LP in this case, which includes the name and position of each person who worked on the case, his hourly billing rate, the number of hours he

worked on the case, and his lodestar, is attached hereto as Exhibit A. Should the Court desire to review LP's detailed individual time entries in considering Plaintiffs' motion for an award of reasonable attorneys' fees, those records can be made available.

6. The billing rate for each LP attorney is set in a manner designed to be commensurate with the rates charged by attorneys with similar levels of education and expertise who provide similar services to those of LP's attorneys. My practice is heavily focused on complex securities and financial services litigation. Since LP has a National practice our co-counsel and opposing defense counsel are frequently from large financial centers such as New York, Washington D.C., and Atlanta. The attorneys who performed work on the Actions included myself, Erica Reed, and Laura Dunning, and the hourly rates are designed to be commensurate with similarly-situated professionals in these complex practice areas. I believe that the hourly rates reflected in Exhibit A are consistent with the rates that would be charged in the marketplace for the same complex work by attorneys with the same level of education and expertise and that would be or have been approved by local federal and state courts.

7. In planning for the funding of this case, each of the firms serving as Class Counsel agreed to utilize and contribute to a litigation fund from which expenses would be paid, and the fund was managed by LP. The litigation-related expenditures from this fund and for which Plaintiffs seek reimbursement from the Settlement Fund and LP's additional litigation costs are described in Exhibit B.

8. A detailed itemization of all of the above-described costs as well as invoices and other supporting documentation, are available for each of the individual costs and expenses on which the above-summary is based, should the Court wish to review them.

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

Executed on August 21, 2014.

/s/ Peter Mougey

EXHIBIT A

Bilewicz v. FMR, Fidelity Investments

TIME KEEPER	RATE	TIME	CHARGES
Partners			
Mougey, Peter J. (PJM)	\$650	136.10	\$88,465.00
		136.10	\$88,465.00
Of Counsel			
Dunning, Laura (LSD)	\$550	85.90	\$47,245.00
		85.90	\$47,245.00
Associates			
Reed, Erica (EAR)	\$550	82.50	\$45,375.00
		82.50	\$45,375.00
Investigators			
Barrett, Patrick (PB)	\$215	76.20	\$16,383.00
		76.20	\$16,383.00
Analyst			
Dave, Jay (JD)	\$215	55.40	\$11,911.00
		55.40	\$11,911.00
Law Clerks / Paralegals			
Crochet, Margaret (MC)	\$215	1.30	\$279.50
Felps, Elizabeth (EF)	\$150	41.30	\$6,195.00
Taylor, Meredith (MT)	\$125	40.10	\$5,012.50
		82.70	\$6,474.50
Grand Total		518.80	\$203,942.50

Exhibit A

EXHIBIT B

In Re Bilewicz v. FMR LLC, et al.
Yeaw, et al. v. FMR LLC, et al.
Levin Papantonio et al, Expense Summary

Expense LP/Lit Fund	Amount
Commercial Copies	\$409.96
Computer Research (Legal)	
Court Fees	
Court Reporters/Transcripts	
Database Services	\$328.08
Document Management	\$1,508.81
Experts/Consultants	\$54,740.73
Filing Fees	
Internal Copies	\$162.47
License Fees	
Mediation Services	\$38,708.75
Messenger	
Miscellaneous	
Postage/Express Delivery	\$295.13
Process Service	
Telephone/Facsimile	\$615.37
Travel (Air fare, ground travel, meals, lodging)	\$4,879.54
TOTAL	\$101,648.84