

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MYA BATTON, AARON BOLTON,
MICHAEL BRACE, DO YEON IRENE KIM,
ANNA JAMES, JAMES MULLIS,
THEODORE BISBICOS, and DANIEL
PARSONS, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF
REALTORS, ANYWHERE REAL ESTATE, INC.
FORMERLY KNOWN AS REALOGY HOLDINGS
CORP., RE/MAX LLC, and KELLER WILLIAMS
REALTY, INC.,

Defendants.

Case No. 1:21-cv-00430 (LAH)

**DECLARATION OF VINCENT BRIGANTI IN SUPPORT OF
CLASS COUNSEL’S MOTION FOR AN AWARD OF
ATTORNEYS’ FEES AND PAYMENT OF LITIGATION EXPENSES,
AND PLAINTIFFS’ REQUEST FOR SERVICE AWARDS**

I, Vincent Briganti, hereby declare:

1. I am the Chairman of the law firm of Lowey Dannenberg, P.C (“Lowey”), Class Counsel for Plaintiffs and the Settlement Classes. I make this Declaration in support of Class Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Litigation Expenses, and Plaintiffs’ Request for Service Awards (“Fee and Expense Application”) filed concurrently herewith. I have personal knowledge of the matters stated herein and, if called upon to testify to those facts, I could and would do so competently.

2. At all times relevant hereto, Lowey served as co-lead counsel with Korein Tillery, LLC for Plaintiffs and the proposed Settlement Classes in the above-captioned action (the “Action”). Unless otherwise defined, capitalized terms herein have the same meaning as in the Settlement Agreements between Plaintiffs and Keller Williams Realty, LLC (“Keller Williams”) and RE/MAX LLC (“RE/MAX”).

3. The statements herein are true to the best of my personal knowledge, information, and belief based on the books and records of Lowey and information received from Lowey attorneys and staff.

4. As detailed in Lowey’s resume submitted in connection with Plaintiffs’ Motion for Preliminary Approval of the RE/MAX Settlement (ECF No. 310-3), Lowey has extensive experience prosecuting antitrust and other complex class actions.

5. The schedule attached as **Exhibit A** summarizes the hours and lodestar of Lowey from inception of this Action to March 31, 2026, the date when the RE/MAX Settlement was preliminarily approved. The total hours were determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm. Lodestar calculations for the time incurred are based on the firm’s current hourly rates and were prepared based upon daily time records maintained by attorneys and professional support staff at the firm. Lodestar figures do not include charges for expense items. Lowey’s time records have been reviewed to confirm both the accuracy of the entries as well as the necessity for and reasonableness of the time expended in this litigation. As a result of this review, certain reductions were made to time and lodestar either in the exercise of billing judgment or to conform with my firm’s practice.

6. The time set forth in this Declaration does not include the hours Lowey spent or will spend preparing this Fee and Expense Application, briefing final approval of the Settlement after March 31, 2026, communicating with Settlement Class Members after March 31, 2026, preparing for and attending the Settlement Hearing on July 28, 2026, and administering the Settlement, assuming it is approved by the Court.

7. The hourly rates for the attorneys and other professional support staff at my firm are the same as the usual and customary hourly rates used for their services in contingent and non-contingent matters, and have been approved by other courts in similar matters. *See, e.g., Dennis v. JPMorgan Chase & Co.*, No. 16-CV-6496 (LAK), 2023 WL 3646801, at *2 (S.D.N.Y. May 25, 2023) (in antitrust action, finding Lowey's hourly rates were appropriate). For personnel no longer employed by Lowey, the lodestar calculation is based on the billing rates for such personnel in his or her final year of employment. The total lodestar does not include charges for expense items.

8. The services Lowey performed on behalf of the putative class include, but are not limited, the following:

- a. Researched core factual and legal issues, including the residential real estate market, the relevant anticompetitive rules, their impact in the market, potential damages, and the antitrust and consumer protection laws in all 50 states;
- b. Developed liability theories, and drafted, revised, and finalized complaints;
- c. Researched and drafted motion to dismiss briefing;
- d. Negotiated case schedules, ESI protocol, and discovery plans, and drafted requests for production of documents, initial disclosures, and written discovery responses;
- e. Conducted document review;

- f. Prepared for and defended depositions and conducted transcript/errata follow-up;
- g. Consulted closely with experts and reviewed and revised expert reports;
- h. Researched and drafted class certification briefing;
- i. Researched and drafted and revised objections to seller settlements and related appellate briefing;
- j. Appeared for and argued in status conferences and motion hearings; and
- k. Researched and drafted mediation briefing and led mediation and settlement efforts.

9. The total time invested in this action by my firm is 7,449.17 hours. The total loadstar value of these professional services is \$8,691,886.20.

10. Attached as **Exhibit B** is a schedule of Lowey's expenses reasonably incurred in connection with this litigation for which reimbursement is requested. Expense items are billed separately, and such charges are not duplicated in the firm's current billing rates. Further, expense items do not contain any general overhead costs, and do not contain a surcharge over the amount paid to the corresponding vendor(s).

11. The requested payment for litigation expenses should also be approved because the expenses were reasonably and necessarily incurred in the prosecution of the Action.

12. As detailed and categorized in the schedule attached as **Exhibit B**, Lowey incurred a total of \$1,972,103.55 in expenses from inception through March 31, 2026. The schedule is based upon expense records recorded in Lowey's books and records. These books and records are prepared from expense vouchers, check records, receipts, and other source materials.

* * *

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

Executed this 9 day of June, 2026, in White Plains, New York.

/s/ Vincent Briganti
Vincent Briganti

EXHIBIT A

Attorneys	Role	Total Hours	Hourly Rate	Total Lodestar
Alesandra Greco	Associate	63.90	\$675.00	\$43,132.50
Anthony Christina	Senior Associate	69.60	\$895.00	\$62,292.00
Charles Kopel	Associate	0.50	\$830.00	\$415.00
Christian Levis	Partner	70.90	\$1,395.00	\$98,905.50
Christopher DeVivo	Associate	83.00	\$490.00	\$40,670.00
Frank Strangeman	Senior Associate	27.10	\$995.00	\$26,964.50
Geoffrey Horn	Partner	37.90	\$1,795.00	\$68,030.50
Ghavrie Walker	Associate	300.90	\$590.00	\$177,531.00
John D'Amico	Senior Associate	4.50	\$895.00	\$4,027.50
Karyn Osinowo	Associate	272.90	\$590.00	\$161,011.00
Katherine Boyd	Associate	1.40	\$675.00	\$945.00
Lanay Mitchell	Associate	58.50	\$460.00	\$26,910.00
Luke Goveas	Associate	97.40	\$525.00	\$51,135.00
Margaret MacLean	Partner	854.60	\$1,395.00	\$1,192,167.00
Matthew Roberts	Associate	7.80	\$370.00	\$2,886.00
Megan McKenzie	Associate	681.90	\$560.00	\$381,864.00
Nicole Veno	Senior Associate	23.70	\$1,250.00	\$29,625.00
Noelle Forde	Senior Associate	2,659.91	\$1,250.00	\$3,324,887.50
Peter Demato	Senior Associate	282.00	\$1,250.00	\$352,500.00

Attorneys	Role	Total Hours	Hourly Rate	Total Lodestar
Alesandra Greco	Associate	63.90	\$675.00	\$43,132.50
Peter St. Phillip	Partner	0.90	\$1,795.00	\$1,615.50
Radhika Gupta	Associate	260.06	\$895.00	\$232,753.70
Raymond Girnys	Partner	8.40	\$1,395.00	\$11,718.00
Sitso Bediako	Partner	80.40	\$1,395.00	\$112,158.00
Sylvie Bourassa	Associate	10.30	\$675.00	\$6,952.50
Vincent Briganti	Partner	1,165.00	\$1,795.00	\$2,091,175.00
Vincent Cappucci	Associate	83.00	\$675.00	\$56,025.00
Xin Huang	Associate	153.00	\$645.00	\$98,685.00
TOTAL:		7,359.47		\$8,656,981.70

Non-Attorneys	Role	Total Hours	Hourly Rate	Total Lodestar
Brenda Diaz	Paralegal	14.50	\$470.00	\$6,815.00
Joanne Mannion	Legal Practice Assistant	3.50	\$270.00	\$945.00
Katherine Vogel	Paralegal	10.00	\$470.00	\$4,700.00
Maribel Valentin	Legal Practice Assistant	5.80	\$270.00	\$1,566.00
Melonie Penrhyn	Paralegal	11.40	\$315.00	\$3,591.00
Myra Fromholz	Paralegal	42.50	\$395.00	\$16,787.50
TOTAL:		89.70		\$34,904.50

EXHIBIT B

Expense Categories	Expenses
Travel - Airfare, Lodging, Meals, Taxi	\$10,852.05
Computer Research, Databases & Docket	\$11,496.23
Document Production, Review, IT and Maintenance	\$33,322.13
Professional, Consulting, or Expert Fees	\$1,911,459.08
In-House Copying	\$2,524.40
Postage, Mailing, FedEx, UPS, Fares & Messengers	\$715.46
Service and Filing Fees	\$1,677.20
Publications, Library, Subscriptions & Promotion	\$57.00
TOTAL	\$1,972,103.55