

EXHIBIT 4

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UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF PENNSYLVANIA

MARTIN HOWARD, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

ARCONIC INC., et al.,

Defendants.

) Civ. Action No. 2:17-cv-01057-MRH
) **(Consolidated)**

) **CLASS ACTION**

) **DECLARATION OF JANET L. SULLIVAN**
) **IN SUPPORT OF LEAD PLAINTIFFS'**
) **MOTION FOR FINAL APPROVAL OF THE**
) **SETTLEMENT AND PLAN OF**
) **ALLOCATION AND FOR LEAD**
) **COUNSEL'S MOTION FOR AN AWARD**
) **OF ATTORNEYS' FEES AND EXPENSES**
) **AND AN AWARD TO LEAD PLAINTIFFS**
) **PURSUANT TO 15 U.S.C. §78u-4(a)(4)**

I, Janet L. Sullivan, declare as follows:

1. I respectfully submit this declaration in support of Lead Plaintiffs' Motion for Final Approval of the Settlement and Plan of Allocation, and Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses, and an Award to Lead Plaintiffs pursuant to 15 U.S.C. §78u-4(a)(4) in the amount of \$15,000 in connection with my representation of the Class. I have personal knowledge of the statements herein and, if called upon as a witness, could and would competently testify thereto.

2. In seeking appointment as lead plaintiff, I understood my duty to serve the interests of the Class by supervising the management and prosecution of the Litigation under the guidance of lead counsel Robbins Geller Rudman & Dowd, who also worked on this matter with Curtis V. Trinko Esq. of the Law Offices of Curtis V. Trinko LLP. I understand that Pomerantz LLP is also

serving as lead counsel and represents lead plaintiff Iron Workers Local 580 – Joint Funds and Ironworkers Local 40, 361 & 417 – Union Security Funds in this Litigation.

3. Lead Counsel vigorously prosecuted this case on behalf of the Class for six years. Ultimately, Lead Counsel agreed to settle the case, only after balancing the risks of trial and appeal, against the immediate benefit of a \$74,000,000 recovery.

4. Following my appointment as lead plaintiff and over the course of the Litigation, I was kept fully informed regarding case developments and procedural matters by David Rosenfeld of Robbins Geller, who is the lead Robbins Geller partner on this matter. Specifically, as a lead plaintiff in this action, I: (a) engaged in numerous meetings, phone conferences, and correspondence with Lead Counsel; (b) reviewed pleadings and briefs; (c) reviewed detailed correspondence concerning the status of the Litigation; (d) searched for and provided Lead Counsel with documents relevant to this Litigation; (e) consulted with Lead Counsel regarding litigation and settlement strategy; and (f) was kept informed about all aspects of the mediation and settlement negotiations.

5. I have evaluated the significant risks and uncertainties of continuing litigation, including the possibility of a nominal recovery or even no recovery at all, and have authorized Lead Counsel to settle this litigation for \$74,000,000. I am aware of the possibility of losing at class certification, summary judgment, or trial and that, even if lead plaintiffs were to prevail at each of these steps, defendants would likely appeal, further delaying any recovery for the Class. I believe this Settlement is fair and reasonable, represents an excellent recovery, and is in the best interest of the Class.

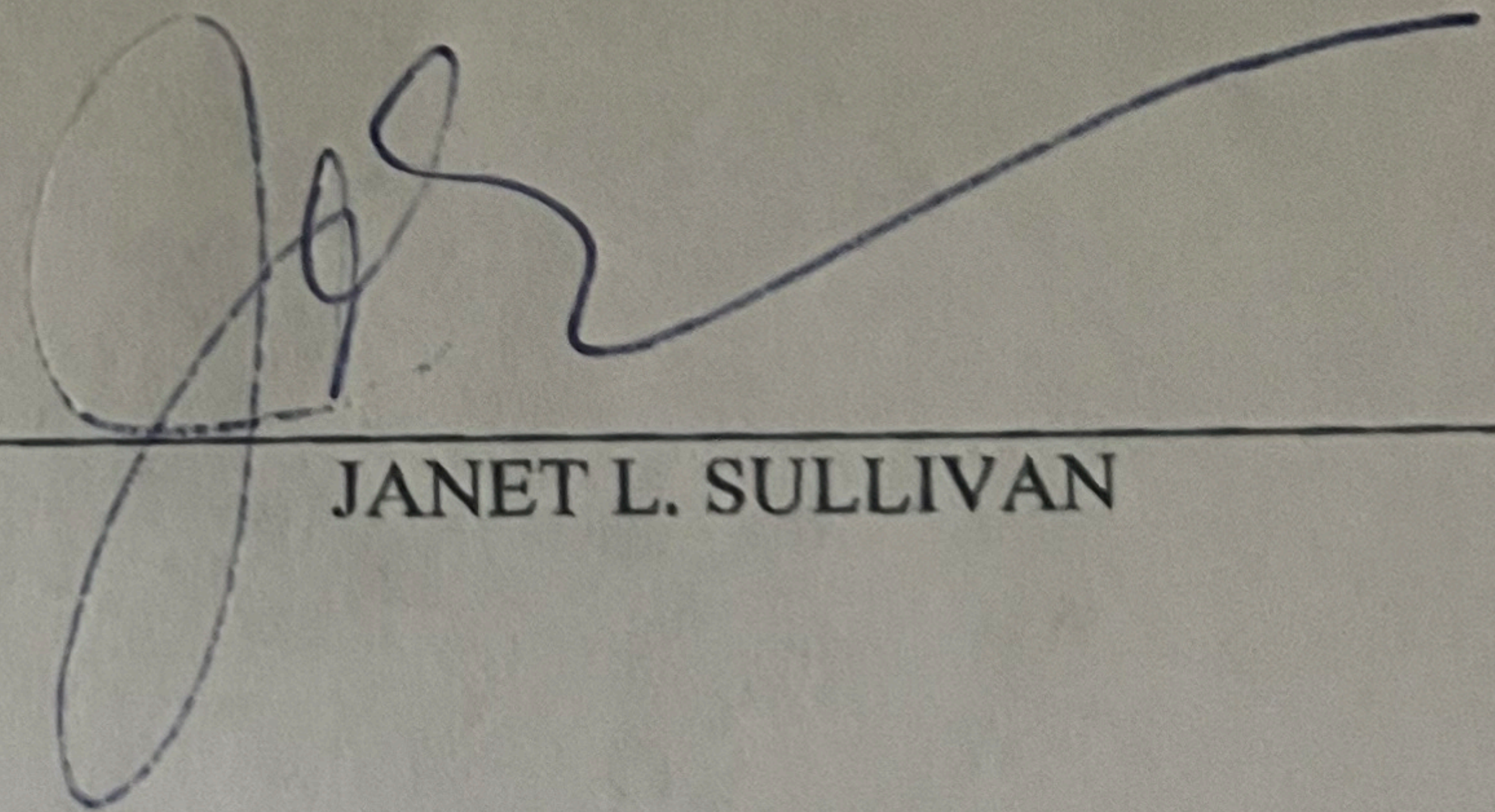
6. While I recognize that the determination of attorneys' fees and expenses is made by the Court, I believe that Lead Counsel's request for an award of attorneys' fees of 33 1/3% of

the Settlement Amount and their litigation expenses, plus interest on both amounts, is fair and reasonable, as this Settlement would not have been possible without Lead Counsel's diligent and aggressive prosecutorial efforts.

7. Since its inception in 2017, I have expended approximately 150 hours on the prosecution of this Litigation, which would otherwise have been focused on other activities. Based upon the time that I spent acting for the benefit of the Class, I believe my request for an award of \$15,000 is appropriate.

8. In light of the foregoing, I respectfully request that the Court grant final approval of the Settlement and the plan of allocation, approve Lead Counsel's motion for an award of attorneys' fees and expenses, and grant my request for a \$15,000 award for the time expended in representing the Class in the Litigation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed this 5th day of July 2023, in The Villages, Florida.



JANET L. SULLIVAN