

EXHIBIT 7

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

MARTIN HOWARD, Individually and on)
Behalf of All Others Similarly Situated,)
)
Plaintiff,) **Civ. Action No. 2:17-cv-01057-MRH**
) **(Consolidated)**
) **CLASS ACTION**
)
vs.)
)
ARCONIC INC., KLAUS KLEINFELD,)
WILLIAM F. OPLINGER, ROBERT S.)
COLLINS, ARTHUR D. COLLINS, JR.,)
KATHRYN S. FULLER, JUDITH M.)
GUERON, MICHAEL G. MORRIS, E.)
STANLEY O'NEAL, JAMES W. OWENS,)
PATRICIA F. RUSSO, SIR MARTIN)
SORRELL, RATAN N. TATA, ERNESTO)
ZEDILLO, MORGAN STANLEY & CO.)
LLC, CREDIT SUISSE SECURITIES (USA))
LLC, CITIGROUP GLOBAL MARKETS)
INC., GOLDMAN SACHS & CO., J.P.)
MORGAN SECURITIES LLC, BNP)
PARIBAS SECURITIES CORP.,)
MITSUBISHI UFJ SECURITIES (USA),)
INC., RBC CAPITAL MARKETS, LLC, and)
RBS SECURITIES INC.)
)
Defendants.)
)
_____)

DECLARATION OF ALFRED G. YATES, JR. IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT,
AWARD OF ATTORNEYS' FEES AND EXPENSES, AND AWARD TO PLAINTIFFS

I, ALFRED G. YATES, JR., declare as follows:

1. I am an attorney admitted to practice in this Court and principal of the firm Law Office of Alfred G. Yates, Jr. P.C., local counsel for court-appointed Lead Plaintiffs Iron Workers Local 580 – Joint Funds, Ironworkers Locals 40, 361 & 417 – Union Security Funds, and Janet L. Sullivan (collectively, “Plaintiffs”) in the above-captioned action (the “Action”).

2. I respectfully submit this declaration in support of Plaintiffs’ Unopposed Motion for Final Approval of Class Action Settlement, Award of Attorneys’ Fees and Expenses, and Award to Plaintiffs. I have personal knowledge of the matters stated herein.

3. My firm has been involved in this Action since its inception in August 2017. In its capacity as local counsel, my firm has communicated with plaintiff lead counsel to discuss various status and strategy matters, attended court conferences and hearings, and has followed the progress of the consolidated actions through the review of the docket to provide lead counsel with direction in accordance with the local rules and practices of the United States District Court for the Western District of Pennsylvania. I am the attorney that was responsible for overseeing the work conducted by my firm in this Action.

4. Attached hereto as Exhibit A is a detailed summary indicating the amount of time spent by each attorney or paralegal of my firm who was involved in this Action. As set forth therein, the total number of hours expended on this Action by my firm’s attorneys and paralegals is **206.95**. The hourly rates shown in Exhibit A are the usual and customary rates set by the firm for each individual. The total lodestar based on those rates is **\$142,795.50**.

5. Attached hereto as Exhibit B is a detailed summary indicating the unreimbursed expenses that my firm has incurred in connection with the prosecution of this Action. As set forth therein, my firm has incurred a total of **\$697.09** in such expenses.

6. The information in this declaration regarding the firm's time and expenses is taken from time and expense printouts and supporting documentation prepared and/or maintained by the firm in the ordinary course of business. I reviewed these printouts (and backup documentation where necessary or appropriate) in connection with preparing this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, I believe that the time reflected in the firm's lodestar calculation and the expenses for which reimbursement is sought, as set forth in this declaration, are reasonable and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

7. Attached hereto as Exhibit C is brief biography of my firm and its attorneys.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th day of July, 2023 at Pittsburgh, Pennsylvania.



Alfred G. Yates, Jr.

Exhibit A

Howard v. Aronic, Inc., et al.

USDC WD PA 2:17-cv-01057-MRH

Lodestar Summary
for Law Office of Alfred G. Yates, Jr., P.C.

<i>Attorney Name</i>	<i>Hours</i>	<i>Hourly Rate</i>	<i>Lodestar</i>
Alfred G. Yates, Jr.	106.95	\$690	\$73,795.50
Gerald L. Rutledge	100.00	\$690	\$69,000.00
<i>Totals:</i>	<i>206.95</i>		<i>\$142,795.50</i>

Exhibit B

Howard v. Aronic, Inc., et al.
USDC WD PA 2:17-cv-01057-MRH

Expense Summary
for Law Office of Alfred G. Yates, Jr., P.C.

<i>Date</i>	<i>Description</i>	<i>Cost</i>
09/15/2017	Court cost to file complaint.	\$400.00
11/27/2018	Rental cost for conference room at Allegheny County Bar Association for lead counsel from out-of-town to meet.	\$200.00
11/27/2018	Lunch.	\$16.99
12/07/2018	Cost for court transcript of 11-27-2018.	\$80.10
	<i>Total:</i>	\$697.09

Exhibit C

Howard v. Aronic, Inc., et al.
USDC WD PA 2:17-cv-01057-MRH

Firm Biography
for Law Office of Alfred G. Yates, Jr., P.C.

1575 McFarland Road, Suite 305
Pittsburgh, PA 15216
Phone: (412) 391-5164
Email: yateslaw@aol.com

Attorneys

ALFRED G. YATES, JR., born Sarver, Pennsylvania; AV Rating from Martindale-Hubbell; admitted to the bar of the Commonwealth of Pennsylvania and the U.S. District Court for the Western District of Pennsylvania (1973); U.S. Court of Appeals, Third Circuit (1982). Education: University of Pittsburgh (J.D., 1973), College of William and Mary (A.B., 1968). With U.S. Army 1968-1970.

GERALD L. RUTLEDGE, born Bronxville, New York; admitted to the bar of the Commonwealth of Pennsylvania and the U.S. District Court for the Western District of Pennsylvania (1991); U.S. Court of Appeals, Second Circuit (2015), U.S. Court of Appeals, Third Circuit (1996). Education: Duquesne University School of Law (J.D., 1991), Carnegie Mellon University (B.S., 1988).

Firm Resume

The Law Office of Alfred G. Yates Jr., P.C. has been engaged for over 30 years in class action litigation, securities, consumer, antitrust, ERISA and FLSA actions. The firm's office is located in Pittsburgh, Pennsylvania. The firm is currently litigating derivative, class and antitrust and consumer cases pending in courts across the United States. As shown below, the firm has successfully represented defrauded consumers, stockholders and investors in many recoveries.

The firm has served as local counsel in litigation in federal court for the United States District Court for the Western District of Pennsylvania leading to recoveries as follows: *Bell, et al. v. Fore Systems, Inc., et al.*, No. 97-cv-1265, \$11.7 million; *Black Box Sec. Litig.*, No. 03-cv-412, \$2 million; *Black Box Corp. Derivative Litig.* 2:06-cv-01531-JFC (financial relief worth over \$14 million to the company); *Blue Cross of Western Pennsylvania Litig.*, No. 93-1591, \$16 million; *Citiline Holdings, Inc. v. Printcafe Software, Inc., et al.*, No. 03-cv-0959, \$1.6 million; *Chambers Sec. Litig.*, No. 92-cv-0679, \$95 million; *Di Cicco, et al. v. American Eagle Outfitters, Inc., et al.*, No. 95-cv-1937, \$1.95 million; *DQE, Inc. Sec. Litig.*, Master File No. 01-cv-1851, \$12 million, *Fox vs. Equimark Corporation, et al.*, No. 90-cv-1504, \$6.5 million cash; *Federated Mutual Funds*

Excessive Fee Litig., No. 2:04-cv-352-DSC; *Butler, et al. v. Northstar Health Services, Inc., et al.*, No. 96-cv-701, \$5.7 million; *Lan v. Ludrof et al.*, 1:06-cv-00114-SJM, \$5.2 million; *Moorhead v. Consol Energy, Inc., et al* No. 03-cv-1588, \$2.7 million; *Ominsky v. PNC Financial Corp.*, No. 2:90-cv-592, \$6.3 million, *Christner v. PNC Bank Corp.*, No. 2:94-cv-1961, \$5.45 million; *PNC Financial Services Group, Inc. Sec. Litig.*, No. 02-cv-0271, \$36.6 million; *Schmitzer, et al. vs. The Italian Oven, Inc., et al.*, No. 96-cv-1248, \$3.278 million; *Sulcus Computer Sec. Litig. II*, No. 94-cv-0565, \$800,000 and 1.4 million common shares of Sulcus stock; *Tri-Star Farms Limited v. Marconi PLC, et al.*, 01-cv-1573, \$7.1 million, and *Westinghouse Sec. Litig.*, No. 91-cv-354, \$67.25 million.

The firm has also served as plaintiffs' counsel in antitrust and consumer product liability class actions and mass tort actions including: *Aggrenox Antitrust Litigation*, 3:14-md-02516, (D. Conn.), *Automotive Refinishing Paint Antitrust Litig.*, MDL Docket No. 1426 (E.D. Pa.); *Baycol Products Liability Litig.*, MDL 1431 (D. Minn.); *Buspirone Antitrust Litig.*, MDL No. 1410 (S.D. NY); *Dynamic Random Access Memory (DRAM) Antitrust Litig.*, No. M-02-1486 PJH (N.D. Ca.); *Electrical Carbon Products Antitrust Litig.*, MDL No. 1514; *EpiPen Direct Purchaser Litigation*, No. 0:20-cv-00827 (DC Minnesota); *Hypodermic Products Antitrust Litig.*, 05-cv-1602 (JLL/CCC) (D. N.J.); *Keurig Green Mountain Single-Serve Coffee Antitrust Litig.*, 1:14-md-02542 (SD NY); *Lidoderm Antitrust Litig.*, 3:14-md-02521 N.D. Ca.), *Lupron Drug Cases*, Judicial Council Coordination Proceeding No. 4238 (Master File No. 402591)(Superior Ct. Ca.); *Meridia Products Liability Litig.*, MDL No. 1481, Case No. 5:2002-cv-08000(JSG/PH)(N.D. Ohio, Eastern Div.); *Microsoft Corp. Antitrust Litig.*, MDL No. 1332 (D. MD); *Mirapex End-Payor Antitrust Litig.*, 2:09-cv-01044-GLL; *Mushroom Direct Purchaser Antitrust Litig.*, 06-cv-620 (E.D. PA); *Novartis and Par Antitrust Litigation*, 1:18-cv-04361 (SD NY), and *Suboxone (Buprenorphine Hydrochloride and Naloxone) Antitrust Litig.*, 2:13-md-02445 (E.D. PA).

The firm has also served as plaintiffs' counsel in ERISA cases arising out of breaches of fiduciary duties to 401(k) Plan Participants in cases such as *Boston Scientific Corp. ERISA Litig.*, 1:06-cv-10105-JLT, (D. MA); *Cardinal Health, Inc. ERISA Litig.*, C2-04-643 (S.D. Ohio); *General Electric Company ERISA Litig.*, No. 06-cv-315(GLS/RDH) (S.D.N.Y.); *Lanfear v. Home Depot, Inc. et al.*, 1:07-cv-00197-ODE (N.D. GA); *Lear ERISA Litig.*, No. 06-11735 (E.D. Mich.); and *Shanehchian v. Macy's, Inc.*, 1:07-cv-00828-SAS-TSH (S.D. OH).

In cases in which our firm has been involved, the court has recognized the contributions of our counsel.

Magistrate Judge Kenneth J. Benson in *Di Cicco, et al. v. American Eagle Outfitters, Inc., et al.*, 95-CV-1937 (W.D. Pa) stated:

"The court has never seen a more thorough tracking of the requirements for a good class action settlement than that pursued by counsel in this case...The court has been impressed with the competence and candor of counsel..."

District Judge Thomas J. Platt in *Nature's Bounty, Inc., Sec. Litig.*, 94-CV-4818 (E.D. NY), stated:

"Plaintiffs here are represented by several well-known securities litigation firms and by practitioners who, collectively, have many years of experience litigating securities class

actions. There can be no question but that plaintiffs' counsel are adequately skilled and experienced to conduct the proposed litigation."

Court of Common Pleas Judge Christine A. Ward in *Portec Rail Products, Inc. Shareholders Litigation*, G.D. 10-003547 (Pa C.P. Court, Allegheny County) stated after a two-day preliminary injunction hearing:

"[H]earing a case that's presented by counsel of this caliber, it's a real treat, it's a delight..."