

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: MOVEIT CUSTOMER DATA  
SECURITY BREACH LITIGATION

MDL No. 1:23-md-03083-ADB-PGL

This Document Relates To:

1:23-cv-12478  
1:23-cv-12281  
1:23-cv-12561  
1:24-cv-11523  
1:23-cv-12226  
1:23-cv-12273

**DECLARATION OF ALYSON OLIVER IN SUPPORT OF PLAINTIFFS' APPLICATION  
FOR AN AWARD OF ATTORNEYS FEES, REIMBURSEMENT OF EXPENSES, AND  
SERVICE AWARDS FOR SETTLEMENT CLASS REPRESENTATIVES**

I, Alyson Oliver, pursuant to 28 U.S.C. §1746, declare as follows:

1. I am an attorney licensed in the States of Michigan and Texas, as well as numerous federal district courts. I am a founding partner of the law firm of Oliver Bell Attorneys at Law. On January 19, 2024, the Court appointed myself as Time, Fee, and Expense Counsel. *See* MDL Order No. 8. The Court later issued MDL Order Nos. 10 and 11, under which I am responsible for collecting all plaintiffs' counsels' contemporaneously prepared attorney and paralegal time and expense reports and submitting those reports to the Court *ex parte* on a quarterly basis.

2. I submit this Declaration in support of the hours, reasonableness of hourly rates and totals supporting Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Service Awards for the Settlement Class Representatives (the "Declaration"). The information set forth in this Declaration is based upon my personal knowledge.

3. On March 28, 2024, this Court entered MDL Order No. 11 Regarding the Efficient and Cost-Effective management for Plaintiffs' Staffing Timekeeping, Costs, and Compensation.

4. MDL Order No. 11 requires each firm to contemporaneously record and transmit to myself each month a detailed, task-based spreadsheet with their time entries. The reports contain a chronological listing of time reported for work performed by attorneys and paralegals in specified activity categories (Litigation Task Codes), a complete and accurate categorization of work performed, and the Lead Counsel who authorized the time.

5. To control plaintiffs' lodestar, MDL Order No. 11 instructed plaintiffs' counsel not to submit time for work not requested by Co-Lead Counsel, duplicative work, reading and reviewing, preparing time and expense reports, routine clerical tasks, or work related to any client not retained. Additionally, MDL Order No. 11 required that each firm submit all litigation-related expenses comply with certain parameters, be adequately documented, and if in excess of \$2,000, be approved in advance by one of Co-Lead Counsel.

6. On March 26, 2025, Liaison & Coordinating Counsel emailed all plaintiffs' firms, requesting that they submit individual or firmwide CVs for each attorney and support staff member that has submitted or will submit time in this MDL in order for me to review the reasonableness of each firm's submitted hourly rates.

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7. By July 13, 2025, I finished reviewing the submitted<sup>1</sup> CVs and hourly rates of each firm, and confirmed the reasonableness of the submitted hourly rates. This includes the hourly rates for the professionals at Berger Montague, PC; Lynch Carpenter, LLP; Cohen Milstein Sellers

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<sup>1</sup> There are firms who have not submitted the requested materials, who generally were involved with the litigation early on and have no significant ongoing billing, and who do not include any co-lead firm.

& Toll PLLC; Lockridge Grindal Nauen PLLP; Levin Sedran Berman LLP; and Hagens Berman Sobol Shapiro LLP.

8. I have also reviewed all time and expenses submitted by all plaintiffs' firms from the inception of this MDL through August 31, 2025. For purposes of this declaration, Co-Lead Counsel have asked me to identify the lodestar associated with the Litigation Tasks Codes "Pleadings" and "Other Written Motions / Submissions" for the Co-Lead and Liaison & Coordinating Counsel firms. Based on my review of the time and expense reports, the total number of approved hours expended by the Co-Lead and Liaison & Coordinating Counsel firms on "Pleadings" and "Other Written Motions / Submissions" from the inception of this MDL through August 31, 2025 is 6336.3 hours, resulting in a lodestar of \$4,811,075.50 based on the firms' hourly rates.

9. Consistent with my obligations under MDL Orders Nos. 10 and 11, I have been providing quarterly time and expense reports to the Court and most recently provided the Court with time, expenses, and lodestar on October 21, 2025.

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

Executed on November 3, 2025  
in, Troy, Michigan.



Alyson Oliver

**CERTIFICATE OF SERVICE**

I hereby certify that, on this date, the foregoing document was filed electronically via the Court's CM/ECF system, which will send notice of the filing to all counsel of record.

Dated: November 3, 2025

/s/ Kristen A. Johnson  
Kristen A. Johnson