

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CHANEL ADAVENAIXX, individually and
on behalf of all similarly situated,

No. 1:23-cv-00663-DLF

Plaintiff,

v.

HOWARD UNIVERSITY,

Defendant.

**DECLARATION OF WILLIAM N. SINCLAIR IN SUPPORT OF PLAINTIFF’S
MOTION FOR ATTORNEYS’ FEES, COSTS, EXPENSES, AND INCENTIVE AWARD**

I, William N. Sinclair, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Partner at Silverman Thompson Slutkin & White, LLC (“Silverman Thompson”), which served as local counsel in this action. I am an attorney at law licensed to practice in, *inter alia*, Washington, D.C. I make this Declaration in support of Plaintiff’s Motion for Attorneys’ Fees, Costs, Expenses, And Incentive Award and am fully competent to do so. I have personal knowledge of all matters set forth herein unless otherwise indicated, and, if called upon to testify, I could and would competently do so.

2. My firm undertook this matter on a contingency basis. Through August 27, 2024, my firm expended 36.2 hours with a lodestar of \$17,095.

3. The chart below summarizes the hours, hourly rates, and lodestar of each of the professionals at my firm who performed work on this matter:

NAME		HOURS	RATE	LODESTAR
William N. Sinclair	P	21.1	575	\$12,132.5
Chris Macchiaroli	P	4.9	575	\$2,817.5
Mike Levin	A	.6	375	\$225
Patti Oxenford	LSS	.8	200	\$160

Danielle Caimona	LSS	1.9	200	\$380
Aan Kaippallil	LSS	1.8	200	\$360
Rosemary Scaffidi	LSS	5.1	200	\$1,020
Grand Total		36.2		\$17,095

Partner (P)

Associate (A)

Law Clerk (LC)

Litigation Support

Specialist (LSS)

4. I supervised and worked directly with the attorneys and other professional staff who billed time to this matter. I can aver that the hours reported and the work they reflect were reasonably necessary to the successful commencement, prosecution, and settlement of the Action. I have personally reviewed all of my firm's time entries associated with this case, and have used billing judgment to ensure that duplicative and unnecessary time has been excluded and that only time reasonably devoted to the litigation has been included. My firm's time entries were regularly and contemporaneously recorded by myself and the other timekeepers pursuant to firm policy and have been maintained in the computerized records of my firm. To the extent the Court would like detailed billing records, Silverman Thompson could provide those to the Court.

5. In addition to the time enumerated above, I estimate that my firm will incur an additional 5 – 10 hours of future work in connection with the preparation of Plaintiff's Motion for Final Approval and the fairness hearing.

6. To date, my firm has also expended \$1,145.70 in out-of-pocket costs and expenses in connection with the prosecution of this case. These costs and expenses are reflected in the records of my firm and were necessary to prosecute this litigation. Cost and expense items are billed separately, and such charges are not duplicated in my firm's billing rates. These expenses are detailed in the chart below:

CATEGORY	TOTAL
Filing fees and pro hac vice fees	\$1,140
Copying Costs	\$5.70
TOTAL:	\$1,145.70

7. Included in the chart above detailing my firm's time on this matter are the hourly rates charged for lawyers and staff at my firm at the time the work was completed. Based on my knowledge and experience, the hourly rates charged by my firm are within the range of market rates charged by attorneys of equivalent experience, skill, and expertise. As a matter of firm policy, we do not discount our regular hourly rates for non-contingent hourly work. I have personal knowledge of the range of hourly rates typically charged by counsel in our field in Maryland, California, Washington, D.C., and elsewhere, both on a current basis and in the past. In determining my firm's hourly rates from year to year, my partners and I have consciously taken market rates into account and have aligned our rates with the market.

8. Through my practice, I have become familiar with such rates in several ways: (1) by litigating attorneys' fee applications; (2) by discussing fees with other attorneys; (3) by obtaining declarations regarding prevailing market rates filed by other attorneys seeking fees; and (4) by reviewing attorneys' fee applications and awards in other cases, as well as surveys and articles on attorney's fees in the legal newspapers and treatises. The information I have gathered shows that my firm's rates are in line with the non-contingent market rates charged by attorneys of reasonably comparable experience, skill, and reputation for reasonably comparable class action work.

9. No court has ever cut my firm's fee application by a single dollar on the basis that our hourly rates were not reasonable.

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

Executed this 9th day of September, 2024 at Baltimore, Maryland.

/s/ William N. Sinclair

William N. Sinclair