

# **EXHIBIT 6**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

Yvonne Becker, Christopher Nobles, Rosa  
Ramirez, Valerie Seyler, and Jannien  
Weiner,

Plaintiffs,

v.

Wells Fargo & Co.; Employee Benefit  
Review Committee; Wells Fargo Bank,  
National Association, and John and  
Jane Does, 1-20,

Defendants.

Case No. 0:20-cv-02016 (KMM/BRT)

**DECLARATION OF PETER K.  
STRIS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES, EXPENSE  
REIMBURSEMENT, SETTLEMENT  
ADMINISTRATION EXPENSES,  
AND CASE CONTRIBUTION  
AWARDS**

**CLASS ACTION**

I, Peter K. Stris, declare as follows:

1. This Declaration is submitted in support of Plaintiffs' Motion for Attorneys' Fees, Expense Reimbursement, Settlement Administration Expenses, and Case Contribution Awards.

2. I am a member in good standing of the State Bar of California and a founding partner of the law firm Stris & Maher LLP ("SMLLP").

3. My firm drafted and managed the Ninth Circuit mandamus petition filed in this Action, when this case was in the Northern District of California. I make these statements based on personal knowledge and would so testify if called as a witness.

4. SMLLP attorneys and other professionals provided legal services to Plaintiff Becker and the then-putative class, including reviewing and revising Plaintiffs' opposition to Wells Fargo's motion to transfer; researching and drafting Plaintiffs' mandamus

petition; researching and drafting Plaintiffs’ mandamus petition reply; preparing for oral argument on the mandamus petition (set and calendared by the Ninth Circuit but cancelled at the last minute); and evaluating the resulting opinion and potential next steps. In total, SMLLP has expended \$152,805 in professional services and \$500 in expenses for the work done through April 9, 2021. This value for SMLLP’s professional services was arrived at by using the “lodestar” methodology, which involves determining “the number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate.” *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983).

5. The following is a summary of the hours worked by all firm professionals, their current hourly billing rate (i.e., the rate paid by firm clients in non-contingency cases), and the total amount of lodestar expended in this Action:

<b>Last Name</b>	<b>Title</b>	<b>Hours</b>	<b>Rate</b>	<b>Lodestar</b>
Peter K. Stris	Partner	33.9	\$950	\$32,205
Radha Pathak	Partner	5.4	\$750	\$4,050
Douglas D. Geysler	Counsel	140.5	\$600	\$84,300
John Stokes	Associate	57.8	\$550	\$31,790
Morgan Feldenkris	Litigation Fellow	2.3	\$200	\$460
<b>TOTAL</b>		<b>239.9</b>		<b>\$152,805</b>

6. SMLLP’s prevailing hourly rates have been approved by courts awarding attorneys’ fees in class action settlements. *E.g.*, *Tom v. Com Dev USA, LLC*, No. 16-cv-

01363, ECF No. 166 (C.D. Cal. Dec. 4, 2017); *Dennard v. Transamerica Corp.*, No. 15-cv-00030, ECF No. 121 (N.D. Iowa Oct. 28, 2016).

7. When SMLLP agreed to take on this litigation, we understood—based on our prior experience—that this matter could be expensive, hard-fought, and lengthy. And given the risky nature of ERISA class action litigation in general, we understood there was a significant likelihood that, after having invested a substantial amount of time and expense, we might recover nothing.

8. SMLLP has expended a total of \$500 for court filing fees expenses, which have been invoiced and recorded in our accounting system. Court filing fees are the type of expense that are typically paid by fee paying clients.

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

Executed on June 15, 2022 in Los Angeles, California.

By: /s/ Peter K. Stris  
Peter K. Stris