

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Jennifer Baker and Jean Greenberg, as
representatives of a class of similarly situated
persons, and on behalf of the Investment-Incentive
Plan for John Hancock Employees,

Plaintiffs,

v.

John Hancock Life Insurance Company (U.S.A.), and
the John Hancock US Benefits Committee,

Defendants.

Case No. 1:20-cv-10397-GAO

**DECLARATION OF JASON M.
LEVITON IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND
COSTS, ADMINISTRATIVE
EXPENSES, AND CLASS
REPRESENTATIVE SERVICE
AWARDS**

I, Jason Leviton, declare as follows:

1. I am a co-founding partner of Block & Leviton LLP ("B&L"). I, along with my colleagues at B&L, served as local counsel in connection with this class action suit. I submit this Declaration in Support of Plaintiffs' Motion for Approval of Attorneys' Fees and Costs, Administrative Expenses and Class Representative Service Awards.

2. B&L has significant class action experience, including experience in ERISA class action cases in this Court and throughout the United States. A copy of our firm resume is attached to this Declaration as **Exhibit A**.

3. To date, our firm has spent a total of 3.4 hours of attorney and staff time on this action, representing a total of \$2,122.50 at our current billing rates. Based on my knowledge of the case and my firm's role, the time expended was reasonable and appropriate. A breakdown of the time and lodestar spent by attorney and staff members at B&L is as follows:

Name	Hourly Rate ¹	Hours	Total Lodestar
Jason Leviton (P)	\$900.00	1.70	\$1,530.00
R. Joseph Barton (P)	\$900.00	0.20	\$180.00
Rachel Murphy (PL)	\$275.00	1.50	\$412.50
TOTAL:		3.40	\$2,122.50

P – Partner; PL - Paralegal

4. Over the course of the litigation, B&L also has incurred the following expenses in connection with this action:

Expense	Amount
Complaint Filing Fee	\$400.00
<i>Pro Hac Vice</i> Filing Fees	\$400.00
TOTAL:	\$800.00

5. Because B&L handled this matter on a contingent fee basis, the firm has not been compensated for any of the foregoing time or expenses.

6. Details and material supporting the time records and expenses referenced in this declaration are available upon the request of the Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: August 25, 2021

Respectfully submitted,

Jason M. Leviton
Block & Leviton LLP

¹ B&L practices nearly exclusively on a contingent-fee basis. Therefore, our rates are set by reference to comparable firms.