

Exhibit 4

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RICHARD GOODMAN, *Individually And As
Trustee of the Richard M. Goodman
Revocable Living Trust, And On Behalf Of
All Others Similarly Situated,*

Plaintiff,

vs.

UBS FINANCIAL SERVICES INC.,

Defendant.

Case No.: 2:21-cv-18123-KM-MAH

**DECLARATION OF WILLIAM H. GOODMAN, ESQ. IN SUPPORT OF PLAINTIFF'S
COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION EXPENSES FILED ON BEHALF OF
GOODMAN HURWITZ & JAMES, P.C.**

I, William H. Goodman, declare as follows:

1. I am a partner at the law firm Goodman Hurwitz & James, P.C. (“Goodman Hurwitz & James”).¹ Goodman Hurwitz & James, along with Glancy Prongay & Murray LLP (“GPM”), served as counsel for plaintiff Richard Goodman, individually and as Trustee of the Richard M. Goodman Revocable Living Trust (“Plaintiff”), in the above-captioned action (the “Action”). On February 7, 2022, the Court granted my application to appear *pro hac vice* in the Action. See ECF No. 18.

2. I submit this declaration in support of Plaintiff’s Counsel’s application for an award of attorneys’ fees in connection with services rendered in the Action, as well as for reimbursement of litigation expenses incurred in connection with the Action. I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

3. The Plaintiff in this case, Richard Goodman, has a longstanding relationship with a former employee of the Defendant, Brian Edgar, who has served as Plaintiff’s broker, and who possessed knowledge that was central to the initiation of this litigation, as well as to its successful resolution, to wit:

- a. there would have been no understanding or comprehension that a viable cause of action existed, without the information provided by Mr. Edgar;
- b. Mr. Edgar provided information that allowed the Plaintiff to successfully proceed in this litigation;
- c. without Mr. Edgar, and his cooperation, there would have been no case whatsoever, let alone a successful case; and
- d. it was therefore crucial to the aforementioned success of this case that issues relating to Plaintiff’s ability to use Mr. Edgar’s information, and Mr. Edgar’s ability to share that information, be carefully researched and

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated June 8, 2023. ECF No. 55-1.

analyzed from the outset of Plaintiff's consideration of whether and how to initiate this Action.

4. As a result, Plaintiff's Counsel in this action, Goodman Hurwitz & James, among other things:

- a. reviewed draft pleadings, court orders, and other filings;
- b. provided substantial research and legal analysis regarding Plaintiff's use of information from his critical insider whistle-blower witness, Brian Edgar, and regarding Mr. Edgar's ability to share such information, to wit:
 - i. protection afforded by both federal and state whistle-blower protection statutes;
 - ii. all other protection provided by both statutory and common law to the whistle-blower/informant, referenced above;
 - iii. the extent to which the named Plaintiff, and his counsel, were permitted to assist the whistle-blower and to use his information, without compromising their case; and
 - iv. other matters.
- c. Analyzed and provided advice concerning class action litigation issues, in addition to those referenced above;
- d. Worked, consulted, and conferred with GPM and Plaintiff to prepare for the mediation;
- e. Remotely attended the mediation session overseen by Robert Meyers, Esq. of JAMS; and reviewed and commented on the settlement papers and preliminary approval motion.

5. I am the partner who oversaw or conducted the day-to-day activities in the Action for Goodman Hurwitz & James and, in connection with the preparation of this declaration, I reviewed contemporaneous daily time records regularly prepared and maintained by my firm. The purpose of this review was to confirm both the accuracy of the records, as well as the necessity

for, and reasonableness of, the time committed to the litigation. As a result of this review, I made reductions to certain of my firm's time entries such that the total hours as set forth below reflect the exercise of billing judgment. Based on this review and the adjustments made, I believe that my firm's time was reasonable and necessary for the effective and efficient prosecution and resolution of the Action. No time expended on the application for fees and reimbursement of expenses has been included.

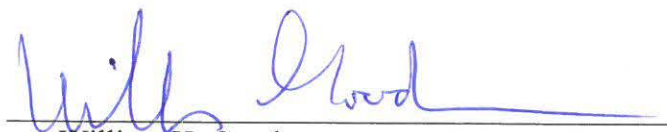
6. My current hourly rate of \$800 per hour is consistent with the rates approved by courts in other complex litigation when conducting a lodestar cross-check.

7. The total number of hours that I spent on this litigation, taking into account the reductions described above, is 82.5 hours, through and including October 13, 2023.

8. Based on the above-described hourly rate and total hours, my firm's total lodestar is \$66,000.

9. Attached hereto as Exhibit A is a brief biography of Goodman Hurwitz & James.

I declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct. Executed on October 26, 2023, in Detroit, Michigan.



William H. Goodman

EXHIBIT A

Goodman Hurwitz & James, P.C.

FIRM RESUME

EXHIBIT A

Goodman Hurwitz & James, P. C.

Goodman Hurwitz & James is a small law firm, consisting of four lawyers – Bill Goodman, Julie Hurwitz, Kathryn James, and Huwaida Arraf. It specializes in representing victims of police and governmental misconduct and focusses on civil rights and is widely recognized as one of the leading firms in this arena in Michigan.

As well the firm has pioneered major class action litigation. It drafted and initiated the original litigation on behalf of the people of Flint, Michigan, after their water was poisoned by government officials. As well, Goodman was one of the original attorneys on the 1971 class action arising from conditions in the Wayne County Jail. Amazingly, this litigation continues to the present day and Goodman remains involved.

Notably, Bill Goodman was the Legal Director of the *Center for Constitutional Rights* in New York City from 1998 to 2007. In that capacity he was engaged in many cases that had a national impact, including *Rasul v. Bush* and *Turkman v. Ashcroft* (which became *Iqbal v. Ashcroft*). In addition to his law practice, Goodman teaches *Constitutional Litigation*, as an Adjunct Professor of Law at Wayne State University Law School.