

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

|                                    |   |                               |
|------------------------------------|---|-------------------------------|
| JOSEPH MANTHA on behalf of himself | : |                               |
| and others similarly situated,     | : |                               |
|                                    | : |                               |
| Plaintiff,                         | : |                               |
|                                    | : | Case No. 1:19-cv-12235-LTS-PK |
| v.                                 | : |                               |
|                                    | : |                               |
| QUOTEWIZARD.COM, LLC               | : |                               |
|                                    | : |                               |
| Defendant.                         | : |                               |
|                                    | : |                               |
|                                    | : |                               |

**DECLARATION OF JOHN W. BARRETT IN SUPPORT OF  
MOTION FOR ATTORNEYS' FEES AND COSTS**

1. I am a partner at Bailey & Glasser LLP. I have served as the firm's President and head of our contingent practice, so I am very familiar with our firm's time and expense tracking, and with our hourly rates, including hourly rates used to determine lodestar for attorneys' fee crosscheck purposes. I have served as one of the lead counsel for the Plaintiffs in this case.

2. I have extensive class action experience. I have handled and won class action, mass action, and individual plaintiff jury trials in federal and state court, and successfully argued appeals to uphold verdicts won in those cases. My firm has the resources to fund and prosecute this case to a successful conclusion. Some of my cases include:

- *Krakauer v. Dish Network, L.L.C.*, No. 1:14-cv-00333, M.D. N.C. (five-day TCPA jury trial and a treble damages award for a certified class, resulting in \$61.3 million judgment, *affirmed* 925 F.3d 643 (4<sup>th</sup> Cir. 2019));
- *Hankins v. Alarm.com Incorporated and Alarm.com Holdings, Inc.*, No. 4:15-cv-06314, N.D. Cal. (settled TCPA class action for \$28 million);
- *In re Monitronics TCPA Litig.*, MDL No. 2493, N.D. W.Va. (appointed MDL Co-Lead Counsel; \$28 million TCPA class action settlement);
- *Mey v. Patriot Payment Group, LLC*, No. 5:15-cv-00027, N.D. W.Va. (\$3.7 million settlement in TCPA class action);

- *Mey v. Venture Data, LLC*, No. 5:14-cv-00123, N.D. W. Va. (\$2.1 million TCPA class action settlement);
- *Mey v. Frontier Communications Corp.*, No. 3:13-01191, D. Conn. (\$11 million nationwide TCPA settlement);
- *Generic Drug Litigation (State of West Va. v. Rite Aid of West Va.*, No. 09-C-27; and *State of West Va. v. CVS Pharmacy, Inc.*, No. 09-C-226 (Circuit Court of Boone County, West Virginia) (as Special Assistant Attorney General, won settlements of more than \$10 million in *parens patriae* consumer protection litigation);
- *Carter v. Forjas Taurus SA et al.*, No. 1:13-CV-24583, S.D. Fla. (class counsel for product liability class action against Brazilian pistol manufacturer; settlement provides for the free exchange of defective pistols for new pistols (unlimited by any claims period), or cash payments of up to \$30 million for returned pistols; total value of settlement \$240 million);
- *Desai v. ADT Security*, No. 11-C-1925, N.D. Ill. (\$15 million TCPA settlement for nationwide class).

3. After making downward adjustments in the exercise of billing judgment, my firm spent 403.4 hours in attorney and paralegal time on this case, yielding a lodestar of \$266,107. I am familiar with the billing rates for attorneys and paralegals with similar experience, particularly with expertise in matters arising under the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* and my firm's billing rates are reasonable and consistent with the rates of attorneys and paralegals of similar experience and qualification, and have been used by us in other cases, both contingent and hourly.

4. Our reasonable and necessary expenses for items including travel, legal research, and other costs total \$1,939.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE SIGNED UNDER PENALTY OF PERJURY OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT EXECUTED THIS THIS 17<sup>th</sup> DAY OF JULY, 2025.

/s/ John W. Barrett  
John W. Barrett