

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

GARY MARCHESE, ESTHER WEINSTEIN,  
and JOAN HOWARD Individually, and on  
Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

CABLEVISION SYSTEMS CORPORATION  
and CSC HOLDINGS, LLC,

Defendants.

Civil Action No. 10-2190 (MCA) (MAH)

**DECLARATION OF PAUL O. PARADIS IN SUPPORT OF PLAINTIFFS'  
MOTION FOR AN AWARD OF ATTORNEY'S FEES, REIMBURSEMENT OF  
EXPENSES, AND PAYMENT OF INCENTIVE AWARDS TO CLASS  
REPRESENTATIVES**

I, Paul O. Paradis, declare as follows:

1. I am a partner and the Managing Member of the law firm of Paradis Law Group, PLLC. I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees, reimbursement of expenses and payment of incentive awards to the class representatives in connection with services rendered in prosecuting this action. I have personal knowledge of the matters set forth in this declaration, and, if called as a witness, could and would testify competently thereto.

2. My firm has acted as counsel for Plaintiffs in this litigation entirely on a contingency fee basis. The background and experience of Paradis Law Group, PLLC and its attorneys are summarized in the curriculum vitae attached hereto as Exhibit 1.

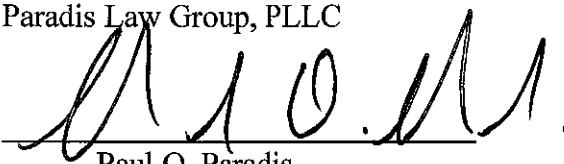
3. During the litigation, my firm was involved in, among others, the following activities: pre-complaint investigation of the matter; legal and fact research concerning the initial

complaint; drafting of the initial complaint; preparation of FRCP 26(f) report; researching and drafting ESI Order; drafting discovery requests and interrogatories; meeting and conferring with defense counsel concerning disputed discovery issues; document review; litigation strategy meetings with co-counsel; preparation of witness for class representative depositions; defense of class representative depositions; legal and fact research concerning Plaintiff's Opposition to Defendant's Motion to Dismiss; legal and factual research concerning amended complaint; and drafting and editing of motion to compel.

4. Attached hereto as Exhibit 2 is a summary lodestar report (including timekeeper, position, rates, and hours) for this matter. The lodestar calculation is a detailed summary indicating the amount of time spent by each attorney and professional support staff at my firm who was involved in the litigation, and the lodestar calculation based on my firm's current hourly billing rates. The schedule was prepared from contemporaneous time records regularly prepared and maintained by my firm, which are available at the request of the Court. The total number of hours expended by my firm from inception through this date is 2,533.75 hours. The total lodestar for my firm is \$1,293,803.75.

5. Exhibit 3 attached hereto is a summary by category of the unreimbursed expenses incurred by my firm in connection with the prosecution of this litigation. The expenses incurred in this action are reflected on my firm's books and records, which are prepared from invoices, receipts, credit card bills, cancelled checks and wire transfer notices, expense vouchers, check records, and other source materials and represent an accurate recordation of the expenses incurred. As detailed in Exhibit 3, my firm has incurred a total of \$30,591.42 in unreimbursed expenses in this litigation.

Paradis Law Group, PLLC

A handwritten signature in black ink, appearing to read "P.O. Paradis", written over a horizontal line.

Paul O. Paradis

Dated: July 19, 2016

## **EXHIBIT 1**

### **PARADIS LAW GROUP, PLLC**

220 West 41 Street – 20<sup>th</sup> Flr.

New York, NY 10036

Telephone: 212-986-4500

Facsimile: 212-986-4501

#### **Firm Résumé**

Paradis Law Group, PLLC (“PLG” or the “Firm”) specializes in large, complex litigation in the fields of securities, mergers and acquisitions, corporate governance, consumer protection, commercial law, investor arbitration, unfair employment practices and antitrust. The Firm’s attorneys have litigated hundreds of cases in both state and federal courts throughout the United States, and are committed to protecting shareholders and victims of corporate and consumer wrongdoing.

Throughout the course of the past thirty years, the attorneys of PLG have been appointed lead or co-lead counsel in cases resulting in billions of dollars in recoveries on behalf of investors and aggrieved parties. As demonstrated below, the attorneys of PLG have served as a lead counsel in some of the largest securities and consumer fraud class action settlements.

#### **THE FIRM’S RECENT ACHIEVEMENTS**

Kacsuta, et al. v. Lenovo (United States) Inc., 13-00316-CJC (RNBx) (C.D. Ca.). Attorneys of PLG represented a class of purchasers of certain Lenovo-manufactured laptops that experienced wi-f- related problems. PLG procured a settlement valued at approximately \$50 million which provided for, among other forms of relief, the repair of class members’ computers, \$100 cash and reimbursement for repair expenses.

In re Bank of America Corp. Stockholder Derivative Litigation, CA. No. 4307-VCS (Del. Ch.). Attorneys of PLG were appointed co-lead counsel in stockholder derivative action brought on behalf of Bank of America against the members of the Board of Directors of Bank of America in connection with the acquisition of Merrill Lynch & Co. The efforts of attorneys from PLG resulted in a settlement of \$62.5 million.

The NVIDIA GPU Litigation, Case No. C 08-04312 (N.D. Cal.). Attorneys of PLG represented a class of purchasers of certain computers alleging consumer fraud claims arising out of purchases of NVIDIA’s defective graphics processing units. In connection with the settlement of these claims, class members were entitled to receive either a replacement computer, repair of a computer or reimbursement for repair. A settlement fund of \$2 million was established.

In re Ticketmaster Sales Practice Litig., 09-cv-0912 (C.D. Cal.). Attorneys of PLG were appointed Co-Lead Counsel to represent a class of purchasers of tickets from TicketsNow.com alleging consumer fraud violations based upon deceptive ticket sales practices. The litigation was resolved for compensation valued at \$16.5 million.

In re: Toyota Motor Corp. Hybrid Brake Marketing, Sales Practices and Products Liability Litigation, 2:10-CV-00946 (C.D. Ca). Attorneys of PLG were appointed interim lead counsel to represent a class of purchasers of certain defective Toyota vehicles.

In re Philips/Magnavox Television Litigation, 09-cv-3072 (D. N.J.). Attorneys of PLG were appointed interim co-lead counsel to represent a class of purchasers of certain defective Philips/Magnavox flat screen televisions. On September 2, 2010, the court denied in material part Philips' motion to dismiss the complaint. In connection with the settlement of the action, a \$4 million settlement fund was created to reimburse class members for the cost of repairs to their televisions.

Conseco Annuity Assurance Co., et al. v. Citigroup, H-03-2240 (S.D. Tx.). Attorneys of PLG represented Conseco Annuity Assurance Company, IHC Health Plans, Inc., and other purchasers of \$2.4 billion Credit Linked Notes issued by Citigroup in a class action alleging securities fraud that was consolidated with Newby v. Enron, et al. The litigation was successfully resolved as a part of a \$2 billion settlement with Citigroup.

Hudson Soft Co., Ltd. v. Credit Suisse First Boston, Inc., H-03-0860 (S.D. Tx.). Attorneys of PLG represented Sapporo, Japan-based Hudson Soft Co., Ltd. in an individual action alleging violation of the federal securities laws by Credit Suisse First Boston, Inc. ("CSFB") in connection with the sales of credit-linked notes issued by CSFB. Litigation was successfully resolved for a confidential sum.

In re Abbott Labs. Derivative S'holders Litig., No. 99 C 7246 (N.D. Ill.). Attorneys of PLG represented stockholders of Abbott Laboratories in a stockholder derivative action that was successfully resolved for corporate governance changes.

Corwin v. Abbott Laboratories, No. 2-03-1283 (Ill. App. Ct. – 2d Dist.). Attorneys of PLG represented stockholders of Abbott Laboratories in a mandamus action calling for the production of the Company's books and records relating to the actions of certain officers in connection with Medicaid fraud. This action proceeded through trial where the trial court ruled in favor of plaintiffs. The trial court's ruling was upheld on appeal.

Daughterity v. International Business Machines Corp., No. 23,162 (Tex. – 21<sup>st</sup> Dist.). Attorneys of PLG represented purchasers of defective computer hard disk drives in an action against International Business Machines Corp. that was successfully resolved in a settlement valued at \$35 million.

Danis v. USN Commun. Inc., No. 98 C 7482, (N. D. Ill.). Attorneys of PLG represented purchasers of USN, Inc. securities in a class action alleging securities fraud. Litigation was successfully resolved for \$44.7 million.

In re Salomon Bros. Treasury Litig., 91 Civ. 5471 (S.D.N.Y.). Attorneys of PLG represented purchasers of United States Treasury securities in a class action alleging securities

fraud, anti-trust and racketeering violations. Litigation was successfully resolved for \$100 million.

### **PROMINENT CASES**

The success of the attorneys of PLG in prosecuting large, complex litigation in the fields of securities, mergers and acquisitions, corporate governance, consumer protection, unfair employment practices and antitrust is demonstrated by the significant results the Firm has achieved for its clients and others. The following is only a representative list of some of the more notable cases that have been, or are currently being, litigated by the attorneys of PLG:

Kacsuta, et al. v. Lenovo (United States) Inc., 13-00316-CJC (RNBx) (C.D. Ca.);

In re Bank of America Corp. Stockholder Derivative Litigation, CA. No. 4307-VCS (Del. Ch.).

In re American Honda Motor Co. Oil Filter Products Liability Litig., 06-cv-1737 (C.D. Cal.);

In re Philips/Magnavox Television Litigation, 09-cv-3072 (D.N.J.);

In re: Toyota Motor Corp. Hybrid Brake Marketing, Sales Practices and Products Liability Litigation, 2:10-CV-00946 (C.D. Cal.);

Marchese v. Cablevision Systems Corporation, 10-cv-2190 (D.NJ)

### **THE FIRM'S LAWYERS**

The Firm's attorneys have successfully prosecuted both complex individual and class actions involving some of the largest corporations in the world.

#### **PARTNERS**

##### **PAUL O. PARADIS**

Paul O. Paradis is the Partner responsible for Firm's Complex Litigation practice and Investigation Group, and is one of the Firm's senior litigators. Throughout his career, Mr. Paradis has specialized in handling highly complex multi-party litigation in federal and state courts across the United States.

Prior to becoming a Partner of the Firm, Mr. Paradis was a Partner at Abbey Spanier Rodd Abrams & Paradis, LLP from 2001 through 2007. Prior to that time, Mr. Paradis was a Senior Partner at Wolf Popper LLP from 1998 to 2001. Mr. Paradis began his legal career at Pomerantz Haudek Block & Grossman as an associate, and became a Partner of the firm in 1996, where he remained until 1998. Prior to practicing law, Mr. Paradis was employed as a portfolio manager at a major Wall Street financial institution.

Mr. Paradis is admitted to the Bar of the State of New York, the State of New Jersey, the United States District Courts for the Southern and Eastern Districts of New York, District of New Jersey, and Eastern District of Michigan. He received his B.S. from Bentley College in 1986, and his J.D. (*cum laude*) from New York Law School in 1990, where he was a member of the New York Law School Law Review.

### **MICHAEL A. SCHWARTZ**

Michael A. Schwartz is one of the Firm's senior litigators. Like Mr. Paradis, throughout Mr. Schwartz's career, Mr. Schwartz has specialized in handling highly complex multi-party litigation in federal and state courts across the United States.

Prior to becoming a Partner of the Firm, Mr. Schwartz was a Partner at Wolf Popper LLP from 1998 to 2007. Mr. Schwartz began his legal career at Pomerantz Haudek Block & Grossman as an associate.

Mr. Schwartz is admitted to the Bar of the State of New York, the United States District Courts for the Southern District of New York, the United States Courts of Appeals for the First and Third Circuits. He received his B.S. from Brooklyn College in 1988, and his J.D. from Brooklyn Law School in 1992.

### **GINA M. TUFARO**

Ms. Tufaro received her B.A. (*magna cum laude*) from Rutgers University in 1999 and her J.D. (*magna cum laude*) from New York Law School in 2002 where she served as Managing Editor of The Journal of Human Rights. Ms. Tufaro is admitted to the Bar of the State of New York, the United States District Courts for the Southern and Eastern Districts of New York and the United States Court of Appeals for the Second, Fifth, Seventh and Ninth Circuits. Published works include: Will Carnivore Devour the Fourth? An Exploration into the Constitutionality of the FBI Created Program, 18 N.Y.L.J. Hum. Rts. 305.

Prior to becoming a Partner of the Firm, Ms. Tufaro was an associate at Abbey Spanier Rodd Abrams & Paradis, LLP where she specialized in complex class and individual actions brought on behalf of victims of corporate, consumer and securities fraud.

### **ASSOCIATES**

#### **MARK BUTLER**

Mr. Butler received his B.A. from Syracuse University in 2007, where he graduated *cum laude*, and received his J.D. from New York Law School in 2010, where he served as a Senior Editor of the *New York Law School Law Review* and graduated *magna cum laude*. He was also a Dean's

List recipient in Fall 2007 and Spring 2008 and was a High Honors Dean's List Recipient in Fall 2008, Spring 2009, Fall 2009, and Spring 2010. Mr. Butler is admitted to the New York State Bar.

**PETER DeMATO**

Mr. DeMato received his B.S. from Stonybrook University in 2010 and his J.D. from Brooklyn Law School in 2013 where he was a member of the *Brooklyn Journal of Corporate, Financial and Commercial Law*. He was also a recipient of the CALI Excellence for the Future Award in Criminal Law in 2010 and the CALI Excellence for the Future Award in Corporate Finance in 2012. Mr. Demato is admitted to the New York State Bar.

**JUSTIN B. SHANE**

Mr. Shane received his B.A. from the University of Delaware in 2003 and his J.D. from Washington and Lee University School of Law in 2006, where he served as Staff Writer and Editor of the *Capital Defense Journal* and graduated magna cum laude, Order of the Coif. Mr. Shane is admitted to the Bar in the State of Delaware and the United States District Court for the District of Delaware.

Before joining the Firm, Mr. Shane practiced corporate and commercial litigation.

**EFRAT PELLET**

Ms. Pellet received her B.A. From New York University and her J.D. from New York Law School where she was president of the Domestic Violence Project. As part of this project, Ms. Pellet trained students to participate in the Courtroom Advocates Project, where students assisted women obtain orders of protection in Family Court against their abusers. Ms. Pellet is admitted to the New York State Bar, and is an active member of the New York County Lawyers Association Appellate Committee.

**ALEXANDRA SIMS**

Alexandra Sims received her B.A. from the University of Rochester (cum laude) and her J.D. from New York Law School where she contributed to the New York Law School Real Estate Reporter, was a real estate associate and a member of the domestic violence project. Ms. Sims is admitted to the New York State Bar, the New Jersey State Bar and the United States District Court for the District of New Jersey.

**AMANDA K. STEIN**

Ms. Stein received her B.A., (*magna cum laude*) from Colby College in 2006 and her J.D. from New York Law School in 2009. Ms Stein is admitted to the State Bar of New York.



**PARALEGALS**

**MOLLY BRIERE**

Molly Briere received her B.A. (*magna cum laude*) from Franklin & Marshall College in 2009.

**ANDREW DeMAIO**

Andrew DeMaio received his B.A. (*magna cum laude*) from Franklin & Marshall College in 2010 and his J.D. from George Mason University School of Law in 2015.

**PROFESSIONALS**

**THOMAS J. HALL**

Thomas J. Hall is a Forensic Engineer responsible for investigative and technical analysis of defective consumer products.

Prior to working for the Firm, Mr. Hall owned and managed a technical consulting and training company, specializing in Vehicle Braking and Stability technology for the transportation industry. Mr. Hall was formerly the Chief Engineer for Global Brake Systems - General Motors for the Robert Bosch Chassis Systems Division. Prior to that, Mr. Hall was the Engineering Manager for System Design and Validation at ITT Automotive, Continental Teves.

Mr. Hall's experience also includes development of ABS, TCS and Stability Control Systems, responsibility for application of system engineering principles and process to the brake industry and development and promotion of brake system proposals and advance braking technologies.

Mr. Hall holds a B.S. in mechanical engineering from the University of Michigan and a M.S. in Finance from Walsh College.

**EXHIBIT 2****MARCHESE, et al. v. CABLEVISION SYSTEMS CORP.  
TIME REPORT**

**Firm Name: Paradis Law Group, PLLC**  
**Reporting Period: Inception through July 18, 2016**

<b>PROFESSIONAL</b>	<b>STATUS</b>	<b>TOTAL HOURS</b>	<b>CURRENT HOURLY RATE</b>	<b>TOTAL LODESTAR</b>
Paul Paradis	P	142.50	\$895.00	\$127,537.50
Michael Schwartz	P	93.50	\$875.00	\$81,812.50
Gina Tufaro	P	572.50	\$825.00	\$472,312.50
Justin Shane	A	173.75	\$425.00	\$73,843.75
Amanda Stein	A	432.25	\$375.00	\$162,093.75
Mark Butler	A	283.25	\$375.00	\$106,218.75
Alexandra Sims	A	197.25	\$375.00	\$73,968.75
Efrat Pellet	A	165.00	\$375.00	\$61,875.00
Peter DeMato	A	242.25	\$375.00	\$90,843.75
Molly Briere	PL	139.25	\$195.00	\$27,153.75
Andrew DeMaio	PL	92.25	\$175.00	\$16,143.75
<b>TOTALS</b>		2,533.75		\$1,293,803.75

P = Partner  
C = Counsel  
A = Associate  
PL = Paralegal

**EXHIBIT 3****MARCHESE, et al. v. CABLEVISION SYSTEMS CORP.  
EXPENSE REPORT****Firm Name: Paradis Law Group, PLLC****Reporting Period: Inception through July 18, 2016**

<b>EXPENSE</b>	<b>AMOUNT</b>
Litigation Fund	\$0
Travel/Hotel/Meals	\$2,850.71
Copying Services	\$8,230.81
Research Services	\$17,560.32
Telephone/Teleconference/Fax	\$180.00
FedEx/Messengers/Postage	\$183.23
Court Filing Fees / Witness Fees / Process Fees	\$1,395.50
Other – Transcript	\$190.85
<b>TOTAL</b>	<b>\$30,591.42</b>