

**JAVERBAUM WURGAFT HICKS
KHAN WIKSTROM AND SININS, P.C.**

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REGINA THOMPSON on behalf of
herself and all others similarly
situated,

Plaintiff,

v.

TRAVELERS INDEMNITY
COMPANY; ST. PAUL
PROTECTIVE INSURANCE
COMPANY and ABC
CORPORATION (1-100)

Defendants

SUPERIOR COURT OF NEW JERSEY
MIDDLESEX COUNTY
LAW DIVISION

Docket No.: MID-L-002108-23

CIVIL ACTION

**MICHAEL A. GALPERN, ESQUIRE
CERTIFICATION**

I, Michael A. Galpern, Esquire, upon my oath certify as follows:

1. I am a partner with the law firm Javerbaum, Wurgaft, Hicks, Kahn, Wikstrom & Sinins, P.C. (“Javerbaum”), counsel of record for Plaintiffs and the class in this matter. I am an attorney-at-law in the State of New Jersey, the Commonwealth of Pennsylvania, the United States Court of Appeals for the Third Circuit, the United States District Courts for the District of New Jersey, and the Eastern District of Pennsylvania. I have specialized in complex civil litigation with a focus on mass torts and class actions for 37 years. I am the past President of the New Jersey Association for Justice and have had leadership positions in numerous other trial lawyer organizations. I have represented tens of thousands of individuals in mass torts and class actions in my career. I

respectfully submit this declaration in support of Plaintiffs' motion for final approval of the settlement of the above-captioned class action.

2. I fully support the proposed settlement in the case at bar and believe it is fair, reasonable, and in the best interest of the class. The named Plaintiffs in this matter also fully support the proposed settlement.

3. I and the other attorneys in my firm have conducted discovery, analysis and legal research regarding the various claims and potential defenses in this matter.

4. I and the other attorneys in my firm also have investigated the facts relating to this case, including research regarding the Defendant's policies and practices and review of discovery produced by Defendant.

5. I and the other attorneys in my firm have diligently prosecuted this case for approximately three years by, inter alia, y investigating Plaintiffs' claims, as well as the claims of class members; editing a motion to remand when this matter was removed to federal court; preparing analyzing discovery on Defendant; reviewing discovery produced by Defendant; participating in a full day of mediation followed by months of continued negotiations.

6. During the pendency of this case, the parties participated in arms-length negotiations over a period of several months, as well as a full day of mediation before the Hon. Peter E. Doyme, A.J.S.C. (ret.). During settlement negotiations, Defendant produced additional data to sufficient to identify the class members and to estimate class-wide damages.

7. I believe the foregoing has allowed our team to evaluate the risks of this case, the relative strengths and weaknesses of the parties' positions, and the reasonableness of the proposed settlement.

8. It is my opinion that the proposed settlement is not only fair and reasonable, but represents an excellent result for the class.

9. The parties have concluded that settlement is desirable in order to avoid the risk and expense of litigation, and to resolve finally and completely all pending and potential claims of Plaintiffs and all members of the class.

10. Substantial arm's-length settlement negotiations have taken place between the parties.

11. Plaintiffs and their counsel recognize the costs and risks of further prosecuting this litigation, and believe that Plaintiffs' best interests, and the interests of all class members, are best served by the proposed class settlement as memorialized in the attached Settlement Agreement.

12. My firm and co-counsel undertook this matter entirely on a contingent basis and were responsible for advancing all costs and expenses in the prosecution of this matter. Any fees earned and reimbursement of expenses in this matter will be limited to such amounts as may be awarded by the Court.

13. To date, attorneys and paralegals from my firm have performed the following work on this matter: Michael A Galpern partner, 54.2 hours at \$850 per hour; Alex Fajardo, associate, 8.3 hours at \$500 per hour; Michelle Clark, paralegal, 9.9 hours at \$150 per hour. My firm's combined lodestar is therefore \$53,190.

14. This time does not include the attorney time that will be required from my firm through and subsequent to the final approval hearing in this matter to cover the final approval hearing, handle class member inquiries, perform various administrative duties, and resolve any potential disputes regarding the implementation of the settlement.

15. Class Counsel has advanced all costs of litigation in prosecuting this matter. The total costs advanced by my firm as of the date of settlement in this matter was \$135 in costs. Additionally, co-counsel advanced \$9,060.94 in costs. Each of these costs were necessary for the successful prosecution and eventual settlement of this matter.

16. Over the last several years, my firm's hourly rates have been approved by courts in numerous class action cases, including recently: Vera v Middlesex Water, MID-L-006306-21; DeMarco v. Atlanticare Health Services, Inc., No. ATL-L-829-22 (Super. Ct. Atlantic Co., N.J.); Cappolina v Franklin Twn GLO-L-1289-21 (Super Ct. Gloucester County)

17. I have served in leadership positions in a number of class actions and mass torts. Such class actions, include, the following cases: Caprarola v. Wells Fargo, Docket No. CAM-L-3570-13 (Super Ct. N.J. 2015); Martinez-Santiago v. Public Storage, 1:14-cv-00302-JBS-AMD (D.N.J.); Castro v. Sovran Self Storage, Inc., 1:14-cv-06445-RBK-JS (D.N.J.) In re Experian Data Breach Litigation, 8:15-cv-01592-AG-DFM (C.D.CA.); In re Yapstone Data Breach Litigation, 4:15-cv-04429-JSW (N.D. Cal); Dickens v. Sedgwick Claims Management, MID-L-5305-16 (Super Ct. N.J.); Morrow v. Quest Diagnostics, 2:17-cv-0948 CCC JBC (D.N.J).

18. I have presented and/or lectured to literally thousands of attorneys throughout New Jersey, The United States and Canada, on issues involving class actions and mass torts. I have taught Product Liability at Rutgers School of Law-Camden for 7 years,

19. The named Plaintiffs in this matter provided substantial assistance to us throughout the case on behalf of the class. Plaintiffs initially contacted class counsel, conferred with class counsel several times, provided documents and information needed to draft the class complaints, and reviewed the class complaints to ensure accuracy. Plaintiffs also provided documents and information needed to draft discovery requests and further prosecute the case to a

successful conclusion. Thus, it is my opinion that Plaintiffs are entitled to the requested incentive awards.

20. The members of the settlement class have been notified of the settlement in the manner previously approved by the Court.

21. Out of 543 class members, none have objected to the proposed class settlement, and just 1 class member has requested exclusion from the class. The opt-out and objection deadline in this matter was March 18, 2026.

I declare under penalty of perjury under the laws of the State of New Jersey that the foregoing is true and correct.

Respectfully submitted,

**JAVERBAUM WURGAFT HICKS
KAHN WIKSTROM & SININS, P.C.**

Dated: March 31, 2026

By: /s/ *Michael A. Galpern*
MICHAEL A. GALPERN, ESQUIRE

Thompson v. Travelers; MID-L-2108-23
TIME SUMMARY REPORT

REPORTING PERIOD: 01/01/23 to Present

Categories

- [1] Investigations, Factual Research
- [2] Client Acquisition/Management
- [3] Pleadings
- [4] Briefs and Pretrial Motions (including legal research)
- [5] Discovery
- [6] Litigation Strategy and Analysis
- [7] Court/Arbitration Appearances (including Settlement)
- [8] Settlement
- [9] Case Management and Administration
- [10] Appeals

Firm/Timekeeper	Job Title	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	Current Hours	Hourly Rate	Current Lodestar
JAVERBAUM WURGAF														
Michael Galpern	Attorney			21.80	21.40	3.00		8.00				54.20	\$850.00	\$46,070.00
Alex Fajardo	Attorney			3.30	5.00							8.30	\$500.00	\$4,150.00
Michelle Clark	Paralegal			2.50						7.40		9.90	\$150.00	\$1,485.00
TOTALS:		0.00	0.00	27.60	26.40	3.00	0.00	8.00	0.00	7.40	0.00	72.40		\$51,705.00

Thompson v. Travelers; MID-L-2108-23

REPORTING PERIOD: 01/01/23 to Present

DESCRIPTION	JAVERBAUM FIRM EXPENSES
Travel (air fare, ground travel, meals, lodging, etc.)	
Postage/Express Delivery/Messenger	
Professional Fees (expert, consultant, investigator, etc.)	\$10.00
Court Fees (filing, etc.)	
Arbitration Fees (filing, etc.)	
Court Reporters/Transcripts	
Service Fees (service of complaint)	\$426.93
Mediation	\$4,587.70
Discovery Fees (eDiscovery)	
Factual Research	
Legal Research	
TOTAL EXPENSES	\$5,024.63