

# EXHIBIT E



I, Sergei Lemberg, under penalty of perjury under the laws of the United States of America, affirm and state as follows:

1. I am the principal of Lemberg Law, LLC. I am a consumer rights attorney experienced in prosecuting actions under various federal and state consumer protection statutes. I have personal knowledge as to all matters set forth in this declaration and could testify to the same if called to do so.

2. My firm has been certified as class counsel, in myriad matters in contested and settlement proceedings.

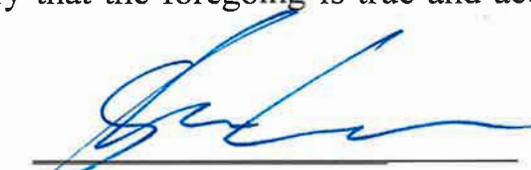
3. We have litigated this case with and on behalf of Plaintiffs and similarly situated consumers since March 2022 when we initiated this matter on behalf of Mike Sherrod.

4. Our lodestar as of November 1, 2024, is \$202,720.00, based on 272.6 hours expended by firm attorneys and paralegal staff. The table attached as Exhibit A sets forth the time expended by professionals and their rates.

5. Lemberg Law has incurred hard costs from the court filing and service fees of \$601.30.

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

Dated: November 4, 2024

  
\_\_\_\_\_  
Sergei Lemberg

**Exhibit A**

Lemberg Law LLC

*Sherrod, et al v. Volkswagen Group of America et al., 22-cv-01537*

<b>Professional</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Sergei Lemberg	\$900	78.3	\$70,470
Stephen Taylor	\$800	121.9	\$97,520
Josh Markovitz	\$500	67.5	\$33,750
Paralegal	\$200	4.9	\$980
	Total:	272.6	\$202,720