

MARTIN A. MUCKLEROY (SBN 9634)
MUCKLEROY LUNT, LLC
6077 South Fort Apache Road, Suite 140
Las Vegas, NV 89148
Telephone: (702) 907-0097
Facsimile: (702) 938-4065
martin@muckleroylunt.com

Liaison Counsel for the Proposed Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

In re TAHOE RESOURCES, INC. SECURITIES)
LITIGATION)

Case No. 2:17-cv-01868-RFB-NJK

)
)
) **DECLARATION OF MARTIN A.**
) **MUCKLEROY IN SUPPORT OF LEAD**
) **COUNSEL’S MOTION FOR AN AWARD**
) **OF ATTORNEYS’ FEES AND**
) **REIMBURSEMENT OF LITIGATION**
) **EXPENSES**
)
)
)
)

I, Martin A. Muckleroy, declare as follows:

1. I am the founder and managing Partner of Muckleroy Lunt, LLC, Counsel for Lead Plaintiff and Liaison Counsel for the Class in the above-captioned action (the “Action”). I am submitting this declaration in support of my firm’s application for an award of attorneys’ fees and expenses in connection with services rendered in the above-entitled action.

2. This firm is Liaison counsel for the Class and assisted Lead Counsel in the litigation of the Action.

3. The information in this declaration regarding the firm’s time and expenses is taken from time and expense records and supporting documentation prepared and/or maintained by the firm in the ordinary course of business. I am the partner who oversaw and/or conducted the day-to-day activities in the litigation and I reviewed these records in connection with the

preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of “billing judgment.” As a result of this review and the adjustments made, I believe that the time reflected in the firm’s lodestar calculation and the expenses for which payment is sought as set forth in this declaration are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. The following chart summarizes that Muckleroy Lunt, LLC spent 304.3 hours of work, representing a lodestar of \$164,707.50 in this case from August 28, 2017 to November 30, 2023. The hourly rates shown below are the usual and customary rates set by the firm for each individual.

Professional	Hours	Rate	Lodestar
Martin Muckleroy (Partner)	231.5	\$625	\$144,687.50
Rachel Aguinaga (Paralegal)	72.8	\$275	\$20,020.00
TOTALS	302.3		\$164,707.50

5. My firm seeks an award of \$3783.00 in unreimbursed expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized as follows:

CATEGORY	AMOUNT
Pro Hac Filing Fees	\$2500.00
Courier Service	\$60.00
Printing	\$614.50
Court Document Fees	\$548.50

TOTAL	\$3783.00
--------------	------------------

6. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from receipts, expense vouchers, check records, and other documents and are an accurate record of the expenses.

7. The total amount of fees and expenses incurred by this firm are appropriate and reasonable when considering the work performed. My Firm served as local counsel for Faruqi & Faruqi. Specifically, my Firm performed, *inter alia*, the following tasks: prepared and filed documents on behalf of Faruqi; researched related actions; attended hearings; reviewed related actions and prepared correspondence regarding same; liaised with Court staff and opposing counsel regarding the matter. All of the work described was non-duplicative and necessary to represent Plaintiffs in the Action.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 6th day of December 2023, Las Vegas, Nevada.



Martin A. Muckleroy