

EXHIBIT 4

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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

NECA-IBEW PENSION TRUST FUND (The Decatur Plan), and ANN F. LYNCH, AS TRUSTEE FOR THE ANGELA LOHMANN REVOCABLE TRUST, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

PRECISION CASTPARTS CORP., MARK DONEGAN, DON R. GRABER, LESTER L. LYLES, DANIEL J. MURPHY, VERNON E. OECHSLE, ULRICH SCHMIDT, RICHARD L. WAMBOLD and TIMOTHY A. WICKS,

Defendants.

No. 3:16-cv-01756-YY

CLASS ACTION

DECLARATION OF ANN F. LYNCH IN SUPPORT OF (I) LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION, AND (II) LEAD COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES, AND AWARD OF LEAD PLAINTIFF'S COSTS AND EXPENSES

I, Ann F. Lynch, declare as follows:

1. I, as Trustee for the Angela Lohmann Revocable Trust (the “Trust”), am a Lead Plaintiff in the above-captioned securities class action (the “Action”).¹ I respectfully submit this declaration in support of (a) Lead Plaintiffs’ Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (b) Lead Counsel’s Motion for Award of Attorneys’ Fees and Expenses, and Award of Lead Plaintiff’s Costs and Expenses, specific to my representation of the Class in the prosecution of this Action.

2. I am aware of and understand the requirements and responsibilities of a representative plaintiff in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4. I have personal knowledge of the matters set forth in this declaration, as I have been directly involved in monitoring and overseeing the prosecution of the Action, including the proposed Settlement, and I could and would testify competently to these matters.

I. LEAD PLAINTIFF’S OVERSIGHT OF THE LITIGATION

3. The Trust, first through my mother, Angela Lohmann, and then through me, has been actively involved in the prosecution of this case since the initial Class Action Allegation Complaint was filed on September 2, 2016. ECF No. 1.

4. Ms. Lohmann, as trustee for the Trust, was appointed as a Lead Plaintiff on November 21, 2016. ECF No. 38. Following Ms. Lohmann’s death, I, as successor trustee of the Trust, was substituted as Lead Plaintiff on May 13, 2020. ECF No. 127.

¹ Unless otherwise defined herein, capitalized terms shall have the meanings ascribed to them in the Stipulation of Settlement (ECF No. 154).

5. In fulfillment of our responsibilities as a Lead Plaintiff on behalf of all Class members in this Action, Ms. Lohmann and I worked closely with Lead Counsel regarding the litigation and resolution of this case.

6. Throughout our involvement in this litigation, Ms. Lohmann and I received periodic status reports from Lead Counsel on case developments, and participated in regular discussions concerning the prosecution of the Action, the strengths and weakness of the claims, and potential settlement. In particular, we both: (a) regularly communicated with our attorneys regarding the posture and progress of the case, as well as strategy; (b) reviewed significant pleadings and briefs filed in the Action; (c) participated in discovery, including producing documents; (d) gave deposition testimony; and (e) consulted with our attorneys regarding settlement negotiations. Specifically, after being substituted for Ms. Lohmann as Lead Plaintiff, I (a) reviewed Court filings, including the operative complaint, the substitution motion (and submitted a declaration in support thereof), and the class certification motion; (b) gathered and supplied to Lead Counsel for production to Defendants additional documents related to the Trust and trustee successorship; (c) reviewed Ms. Lohmann's deposition transcript; (d) participated in over one dozen telephone calls with Lead Counsel; (e) prepared for my deposition, including reviewing relevant documents and participating in several Zoom meetings and teleconferences with Lead Counsel; (f) was deposed for two (2) hours (in addition to Ms. Lohmann's deposition, which was over three (3) hours); and (g) evaluated and approved the proposed Settlement.

II. APPROVAL OF THE SETTLEMENT

7. Through our active participation, Ms. Lohmann and I were kept informed of the progress of the settlement negotiations in this litigation. During the mediation process presided

over by Robert A. Meyer, Esq., we conferred with our attorneys regarding the parties' respective positions.

8. Based on our involvement in the prosecution and resolution of the claims asserted in the Action, I believe that the Settlement provides an excellent recovery for the Class, particularly in light of the risks of continued litigation. Thus, I believe that the proposed Settlement is fair, reasonable, and adequate to the Class and I endorse approval of the Settlement by the Court.

III. LEAD COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES, AND AWARD OF LEAD PLAINTIFF'S COSTS AND EXPENSES

9. I believe that Lead Counsel's request for an award of attorneys' fees in the amount of 33.33% of the Settlement Fund is fair and reasonable in light of the work Lead Counsel performed on behalf of the Class. I have evaluated Lead Counsel's fee request by considering the work performed, the recovery obtained for the Class, and the risks of the Action, and have authorized this fee request for the Court's ultimate determination.

10. I further believe that the litigation expenses for which Lead Counsel has requested reimbursement are reasonable, and represent costs and expenses necessary for the prosecution and resolution of the claims in the Action. Based on the foregoing, and consistent with my obligation to the Class to obtain the best result at the most efficient cost, I support Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses.

11. I understand that reimbursement of a class representative's reasonable costs and expenses (including lost wages) directly relating to the representation of the class is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). For this reason, in connection with Lead Counsel's request for reimbursement of expenses, I am respectfully requesting reimbursement for the costs

and expenses (including lost wages) that Ms. Lohmann and I incurred directly relating to our representation of the Class in the Action.

12. During her time as Lead Plaintiff, Ms. Lohmann was a retired teacher. She devoted approximately 30 hours to the litigation-related activities described above. To the extent the Court cannot assign a value to her time due to her retired status, the Trust only seeks reimbursement of her travel costs for her June 27, 2019 deposition. Ms. Lohmann drove approximately 60 miles round trip for her deposition. At the IRS's 2019 standard mileage rate of 58 cents/mile, this request is for \$34.80.

13. I am the manager of Mugby Junction, a café in Winona, Minnesota. The time that I devoted to the representation of the Class in this Action was time that I otherwise would have spent working. In 2020, my average hourly wage was \$15. I estimate that I devoted approximately 21 hours in the litigation-related activities described in paragraph 6 above. As such, I seek reimbursement in the amount of \$315.00 for the time I devoted to participating in this Action. It is my belief that this request for reimbursement is fair and reasonable.

IV. CONCLUSION

14. In conclusion, I endorse the Settlement as fair, reasonable, and adequate, and believe that the Settlement represents a significant recovery for the Class. I appreciate the Court's attention to the facts presented in my declaration and respectfully request that the Court approve: (a) Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (b) Lead Counsel's Motion for Award of Attorneys' Fees and Expenses, and Award of Lead Plaintiff's Costs and Expenses.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 31st day of March, 2021 in Winona, Minnesota.

DocuSigned by:

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Ann F. Lynch

DECLARATION OF ANN F. LYNCH IN SUPPORT OF (I) LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION, AND (II) LEAD COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES, AND AWARD OF LEAD PLAINTIFF'S COSTS AND EXPENSES