

EXHIBIT 7

Gary M. Berne, OSB No. 774077
gberne@stollberne.com
Jennifer S. Wagner, OSB No. 024470
jwagner@stollberne.com
Lydia Anderson-Dana, OSB No. 166167
landersondana@stollberne.com
STOLL STOLL BERNE LOKTING
& SHLACHTER P.C.
209 SW Oak Street, Suite 500
Portland, OR 97204
Telephone: 503/227-1600
503/227-6840 (fax)

Local Counsel for Plaintiffs

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 JENNIFER WAGNER
FILED ON BEHALF OF STOLL BERNE IN
SUPPORT OF APPLICATION FOR AWARD
OF ATTORNEYS' FEES AND EXPENSES

DECLARATION OF JENNIFER WAGNER FILED ON BEHALF OF
STOLL BERNE IN SUPPORT OF APPLICATION FOR AWARD OF
ATTORNEYS' FEES AND EXPENSES

I, Jennifer Wagner, declare as follows:

1. I am a shareholder in the firm Stoll Stoll Berne Lokting & Shlachter P.C. (“Stoll Berne”). I am submitting this declaration in support of my firm’s application for an award of attorneys’ fees and expenses/charges (“expenses”) in connection with services rendered in the above-entitled action.

2. This firm is local counsel of record for plaintiffs.

3. The information in this declaration regarding the firm’s time and expenses is taken from time and expense reports prepared and/or maintained by the firm in the ordinary course of business. I am one of the lawyers at Stoll Berne who has been involved in the litigation and I reviewed these reports 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. After the reductions referred to above, the number of hours spent on this litigation by my firm is 97.3. A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for attorney time based on the firm’s current rates is \$46,326.50. The hourly rates shown in Exhibit A are the usual and customary rates set by the firm. Nadia Dahab is no longer at the firm, and,

therefore, her current rate was set by reference to the firm's current rates for associate attorneys with equivalent experience.

5. My firm seeks an award of \$2,953.30 in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in Exhibit B.

6. The following is additional information regarding certain of these expenses:

(a) Filing, Witness and Other Fees: \$2,800.00. These expenses have been paid to the Court for filing fees and *pro hac vice* admission fees. The vendors who were paid for these services are set forth in Exhibit C.

(b) Court Hearing Transcript: \$153.30. The vendor that was paid for the hearing transcript is listed in Exhibit D.

7. 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.

8. The identification and background of my firm is attached hereto as Exhibit E.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of March, 2021, at Portland, Oregon.



Jennifer Wagner

EXHIBIT A*NECA-IBEW Pension Trust Fund (The Decatur Plan) v. Precision Castparts Corp., et al.*

No. 3:16-cv-01756-YY

Stoll Stoll Berne Lokting & Shlachter, P.C.

Inception through March 18, 2021

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Gary Berne	(S)	5.4	\$660.00	\$3,564.00
Tim DeJong	(S)	4.7	\$605.00	\$2,843.50
Jennifer Wagner	(S)	53.3	\$485.00	\$25,850.50
Nadia Dahab	(A)	33.9	\$415.00	\$14,068.50
<i>TOTAL</i>		<i>97.3</i>		<i>\$46,326.50</i>

(S) Shareholder

(A) Associate

EXHIBIT B

NECA-IBEW Pension Trust Fund (The Decatur Plan) v. Precision Castparts Corp., et al.

No. 3:16-cv-01756-YY

Stoll Stoll Berne Lokting & Shlachter, P.C.

Inception through March 18, 2021

<i>CATEGORY</i>	<i>AMOUNT</i>
Filing, Witness and Other Fees	\$2,800.00
Court Hearing Transcripts and Deposition Reporting, Transcripts and Videography	\$153.30
<i>TOTAL</i>	<i>\$2,953.30</i>

EXHIBIT C*NECA-IBEW Pension Trust Fund (The Decatur Plan) v. Precision Castparts Corp., et al.*

No. 3:16-cv-01756-YY

Stoll Stoll Berne Lokting & Shlachter, P.C.

Filing, Witness and Other Fees: \$2,800.00

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
09/14/2016	USDC (pay.gov)	Filing Fee
09/15/2016	USDC (pay.gov)	<i>Pro Hac Vice</i> Admission
09/15/2016	USDC (pay.gov)	<i>Pro Hac Vice</i> Admission
09/15/2016	USDC (pay.gov)	<i>Pro Hac Vice</i> Admission
09/15/2016	USDC (pay.gov)	<i>Pro Hac Vice</i> Admission
09/19/2016	USDC (pay.gov)	<i>Pro Hac Vice</i> Admission
11/15/2016	USDC (pay.gov)	<i>Pro Hac Vice</i> Admission
11/15/2016	USDC (pay.gov)	<i>Pro Hac Vice</i> Admission
09/06/2018	USDC (pay.gov)	<i>Pro Hac Vice</i> Admission

EXHIBIT D

NECA-IBEW Pension Trust Fund (The Decatur Plan) v. Precision Castparts Corp., et al.

No. 3:16-cv-01756-YY

Stoll Stoll Berne Lokting & Shlachter, P.C.

Court Hearing Transcript: \$ 153.30

<i>DATE</i>	<i>VENDOR</i>	<i>PURPOSE</i>
8/9/2017	Nancy Walker	Hearing Transcript re Defendants' Motion to Dismiss

EXHIBIT E

FIRM RESUME

The logo for Stoll Berne, featuring the name in a blue sans-serif font. The background of the entire page is a light gray geometric pattern of overlapping triangles.

WHO WE ARE

Deeply rooted in the Northwest and nationally recognized for over 40 years, Stoll Berne has produced extraordinary results through practical, strategic and tenacious representation. We are proud that more than half of our client list originates from referrals by satisfied clients and peers. We keep our firm small in order to provide efficient services in specialized areas in which we have significant experience.

A BELIEF IN SOCIAL RESPONSIBILITY

Stoll Berne gives back to its community. Every year, the firm donates a generous percentage of gross revenues to charitable causes. We are a major contributor to the Lawyers' Campaign for Equal Justice, which provides legal services funding to low-income Oregonians. Many of our lawyers donate their time to pro bono legal work, including representing seniors, indigent clients and migrant workers. Our community partners include Self Enhancement, Inc., Community Cycling Center, Ronald McDonald House of Oregon and Southwest Washington, Hoyt Arboretum Friends, CASA, Hands on Portland and Oregon Food Bank. We also participate in charitable fundraising and coach high school mock trial teams.

PERSONAL INTEGRITY AND PROFESSIONAL EXCELLENCE

Our attorneys are selected for their personal integrity, sound judgment and superior academic achievement. Many of our lawyers finished at or near the top of their class at the nation's premier law schools and continue to receive professional honors and accolades. We are consistently peer-rated as among the best lawyers in Oregon, and frequently cited for our publishing in professional journals. Our lawyers are regularly invited to professional speaking engagements.

A PRACTICAL ATTITUDE TOWARD PREVENTING AND RESOLVING DISPUTES

Stoll Berne represents individuals, small and large corporations, financial institutions, and government entities. Our clients, from individuals and closely held corporations to Fortune 500 companies, all have one thing in common – they seek exceptional legal representation. By choosing to concentrate our practice on focused areas of expertise, we offer our clients the opportunity for continued success.

AREAS OF PRACTICE

Antitrust Litigation

We represent United States and international companies and consumers in all aspects of antitrust litigation, including, price-fixing, customer allocation, market division, price discrimination, and unfair or deceptive trade practices.

Appellate

Stoll Berne's attorney provide expert advice to clients on appellate issues at every stage of our representation. The firm's attorneys have appeared before federal circuit courts of appeal throughout the United States and the Oregon appellate courts.

Business Litigation

From everyday contract disputes to bet-the-company litigation, our litigation team works to understand each party's priorities and to create a solution that best serves you.

Business Organizations & Transactions

We act as general and special counsel to businesses engaged in a wide variety of industries, including real estate, finance, securities, technology, sports apparel, agriculture, and health care.

Class Actions

As Oregon's leading plaintiffs'-side class actions firm, we help our clients to level the playing field and find justice. We have earned our reputation and work hard for our clients.

Elections & Government Law

We provide advice and counsel to political campaigns, candidates, and individuals involved in state and local political or governmental processes.

Employment

From wage and hour class actions to advising employers and employees on noncompetition and severance issues, our lawyers handle many aspects of employment law.

Environmental

We have experience litigating environmental issues including mass environmental torts, consumer products contamination, and state and federal natural resource damage recovery.

Healthcare Litigation

We've litigated nearly every type of healthcare dispute, ranging from complex antitrust matters to medical practice break-ups. Our clients range from small group practices to major regional integrated delivery systems and a prominent medical school.

Intellectual Property Litigation

We represent parties in patent, trade secret, trademark, copyright, false advertising, unfair competition, defamation, medical research practice, and related intellectual property matters.

Internal Investigations

We specialize in complex independent investigations of public bodies and private companies. Our deep experience representing both plaintiffs and defendants enables us to approach investigations without bias.

Investor Lawsuits and Arbitrations

Stoll Berne represents individual investors in court against brokerage firms, investment advisors, fiduciaries, registered representatives, and investment advisor representatives.

Lawyer, Accountant & Professional Malpractice

We represent clients in disputes with attorneys, accountants, auditors, insurance brokers, stock brokers, real estate professionals, and many other professionals.

Real Estate

We represent real estate developers, investors, and financial institutions with real estate matters from purchase and sale, construction and financing, to commercial leasing and development, and tax matters.

Securities Compliance & Defense

We represent a number of select national, regional, and local securities broker-dealers and brokers in disputes with customers, with other broker-dealers, and before regulators.

Securities Litigation

Stoll Berne is Oregon's premier securities litigation firm. We have represented as many or more investors in securities and stockbroker fraud cases than any other firm in Oregon and have recovered hundreds of millions of dollars for our clients.

Trust & Estate Litigation

We represent clients involved in trust and estate litigation in a wide range of disputes including self-dealing and mismanagement of assets, business dealings and investment strategies, undue influence and lack of capacity, and accountings.

POWER IN OUR PEOPLE

Lydia Anderson-Dana

Lydia is an associate in the firm's litigation group where she focuses on securities and class actions litigation. Prior to joining Stoll Berne, Lydia served as a law clerk for the Honorable Judge Morgan B. Christen (U.S. Court of Appeals for the Ninth Circuit), and for the Honorable Chief Judge Michael W. Mosman (U.S. District of Oregon).

Elizabeth Bailey

Elizabeth is an associate in the firm's litigation group where she focuses on complex litigation matters. Prior to joining Stoll Berne, Elizabeth served as a law clerk for the Honorable Judge David W. Christel (U.S. District Court, Western District of Washington) as well as a judicial extern to the Honorable Jolie A. Russo (U.S. District Court of Oregon).

Steven Berman

Steve provides clients with responsive, effective, and efficient solutions to complicated problems. Steve's litigation practice focuses on complex business, securities, insurance coverage, and consumer disputes. He also regularly provides counsel to progressive causes and candidates regarding Oregon and local elections law.

Cody Berne

Cody's practice focuses on representing investors who lost money because of fraud and other misconduct, class actions, and business litigation. Before joining Stoll Berne, Cody was a deputy district attorney with the Multnomah County District Attorney's Office and was an associate with the Portland office of Miller Nash Graham & Dunn LLP.

Gary Berne

A founding member of the firm, Gary represents clients in a variety of matters ranging from investment fraud, ERISA, and lawyer and accountant malpractice to insurance coverage claims, will contests, trust disputes, and class actions. He represents clients in both state and federal courts, and many of his cases involve securities, shareholder, partnership, antitrust, or elder abuse claims. Gary also serves as a mediator and arbitrator.

Andrew Davis

As an expert in the areas of commercial real estate and related business transactions, including development, investment, and finance, Andy has earned a loyal client base that relies on him, deal after deal, to move high-profile development projects across the finish line. He advises clients in a wide range of transactions and matters, including the purchase and sale, development, investment, leasing, financing, management, and ownership of commercial properties.

Timothy DeJong

As a tenacious and passionate litigator who focuses on intellectual property, securities, and complex business disputes, Tim regularly handles litigation matters involving patent infringement, trademark infringement, trade secrets, class actions, violations of state and federal securities statutes, financial fraud, and stockbroker malpractice.

Keith Dubanevich

Keith is an accomplished trial, appellate, and healthcare lawyer with over 30 years of experience in more than a dozen different jurisdictions around the country. With a focus on complex dispute resolution, with particular emphasis in the healthcare industry, Keith is adept at handling multi-state and international antitrust cases, consumer litigation, and securities disputes. In healthcare, he has handled peer review disputes, partnership and incorporation matters, and billing investigations. He has also led internal investigations for publish entities as well as for not-for-profit organizations.

Meg Houlihan

Meg is an associate in the firm's litigation group where she focuses on complex litigation matters. Prior to joining Stoll Berne, Meg was an associate at another Portland law firm and also had served as a judicial law clerk for the Honorable Morgan Christen (U.S. Court of Appeals, Ninth Circuit) and the Honorable Michael Simon (U.S. District Court, District of Oregon).

Emily Johnson

Emily is an associate in the firm's litigation group. Emily's practice focuses on complex litigation matters. Prior to joining the firm, Emily was an associate attorney for another Portland law firm where she practiced personal injury litigation. She served as a law clerk in the Civil Enforcement Division – Financial Fraud & Consumer Protection for the Oregon Department of Justice.

Keith Ketterling

Keith is the firm's managing shareholder and is an experienced trial lawyer who represents institutional and individual investors in securities and financial fraud litigation. Additionally, he handles matters involving real estate litigation, securities class actions, trade secret and noncompetition litigation, and other complex business litigation.

Steve Larson

An experienced trial lawyer who handles both hourly and contingent fee cases, Steve has expertise in class actions, consumer cases, antitrust litigation, securities litigation, corporate disputes, intellectual property disputes, unfair competition claims, employment matters, and disputes involving family wealth. Steve regularly represents individuals and businesses in federal and state court and has obtained class-wide recovery in multiple class actions.

Benjamin Leedy

As a shareholder in the firm's real estate and business group, Ben focuses his practice in the areas of commercial real estate acquisitions and dispositions, real estate finance, leasing, and real estate development. He frequently advises clients in connection with purchase and sale transactions, office, retail and industrial leases, and secured lending transactions.

David Lokting

As one of the cornerstones of the firm for over 25 years, David represents clients in a wide range of business and real estate transactions, including forming business organizations (corporations, partnerships, and limited liability companies), buying and selling businesses, equity buy-ins and buy-outs (including business "divorces"), development, acquisition, sale, and financing of all types of commercial and investment real estate, structuring and completing forward and reverse Section 1031 exchanges, and representing developers and lenders in affordable housing projects.

Keil Mueller

Keil is a trial lawyer who regularly represents individual and corporate clients in state and federal court, as well as in arbitration proceedings. His practice focuses on all aspects of complex business litigation, including shareholder and partnership disputes, class actions, securities and financial fraud litigation, contract disputes, and trade secrets litigation.

Yoona Park

As a shareholder in the litigation group, Yoona concentrates her practice on complex litigation, securities law, class actions, and employment litigation. Having handled several high-profile cases, Yoona brings a strong sense of conviction to all her matters, balanced by common-sense judgment and a warm, engaging personality. Yoona is particularly skilled in handling newsworthy and media-sensitive matters, having worked in agency public relations prior to law school.

Joshua Ross

Josh represents clients in a wide variety of civil matters, including complex business disputes, trust and estate litigation, shareholder disputes, consumer and securities fraud actions, class actions, breach of professional and fiduciary duty, and property and contract disputes. In his trust and estate litigation practice, Josh handles matters involving misconduct by trustees or personal representatives, mismanagement of assets by those owing fiduciary obligations, claims concerning capacity to amend estate plans, and undue influence by interested parties.

Robert Shlachter

Rob is an accomplished mediator, arbitrator, and trial lawyer who handles cases in state and federal courts, as well as before arbitration panels, emphasizing all types of complex business litigation. He concentrates on intellectual property, unfair competition, and real estate litigation.

Sophie von Bergen

Sophie is an associate in the firm's litigation group. Prior to joining Stoll Berne, Sophie was a judicial extern to the Honorable Magistrate Judge Stacie F. Beckerman (U.S. District Court, District of Oregon) where she researched and drafted opinions in civil cases and was a summer intern with Stoll Berne.

Jen Wagner

As a trial lawyer who practices in the areas of complex business, securities, financial fraud, employment, and class action litigation, Jen regularly represents clients in state and federal court and in private arbitrations. Jen advocates for her clients with intelligence and integrity and is particularly adept at navigating the unique strategic and procedural challenges of complex business and class action litigation.

To learn more about our areas of practice, our people, and our representative cases, please visit us at stollberne.com.