

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IOWA PUBLIC EMPLOYEES'  
RETIREMENT SYSTEM, *et al.*,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION,  
*et al.*,

Defendants.

Case No. 17-cv-6221 (KPF) (SLC)

Hon. Katherine Polk Failla

**DECLARATION OF PETER SAFIRSTEIN IN SUPPORT OF MOTION FOR  
ATTORNEY'S FEES, LITIGATION EXPENSES, AND SERVICE AWARDS**

Pursuant to 28 U.S.C. § 1746, I, Peter Safirstein, declare as follows:

1. I am a partner in the law firm of Safirstein Law LLC (“Safirstein Law”).

Safirstein Law is successor counsel in this matter to Safirstein Metcalf LLP (in Dissolution) (“Safirstein Metcalf”) (collectively, “The Safirstein Entities”). I, having served as Managing Partner at both Safirstein Law and Safirstein Metcalf, have worked with Co-Lead Counsel for the class in the above-captioned action (the “Action”). I have been actively involved in prosecuting and resolving this Action, am familiar with its proceedings, and have personal knowledge of the matters set forth herein.

2. The Safirstein Entities have worked for many years with Co-Lead Counsel on this Action and fully support the Motion for Attorneys’ Fees, Expenses, and Service Awards.

3. Attached as Exhibit A is a schedule indicating the amount of expenses incurred by the Safirstein Entities in connection with this action from inception through March 15, 2024. These expenses are all reflected on the books and records of the Safirstein Entities. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred. None of the expenses were incurred in connection with the application for attorneys’ fees and expenses.

4. As described in the declaration of Mr. Eisenkraft, a common litigation fund was used and managed by Cohen Milstein. Quinn Emanuel made contributions to the litigation fund. Those contributions are not included in my Exhibit A hereto. Rather, to ensure expenditures are only single-counted, the expenses incurred by the common fund are described and accounted for only in Mr. Eisenkraft’s declaration.

5. The “document creation and reproduction” expense category is where we include such costs as those for court reporters and videographers, as well as copying costs, binding costs,

document scanning, and similar services. Document projects involving third-party vendors are passed through at-cost. There are no administrative charges included in these figures.

6. The “outside professional services” expense category in this Declaration reflects the fees paid to outside vendors for the service of third party subpoenas

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed May 8, 2024  
Ridgewood, New Jersey



Peter Safirstein

# **EXHIBIT A**

**Exhibit A**

**Safirstein Entities Expense Report**

*As-of March 15, 2024*

<b>Category</b>	<b>Amount</b>
Document creation and reproduction (court reporter, videographer, copying, binding, etc.)	\$5,000.00
Outside professional services	\$3,947.50
<b>TOTAL</b>	<b>\$8,947.50</b>