

EXHIBIT 4

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

PRO SLAB, INC., BREMER
CONSTRUCTION MANAGEMENT, INC.,
and FORREST CONCRETE, LLC,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

ARGOS USA, LLC, et al.,

Defendants.

Case No. 2:17-cv-03185-BHH

**DECLARATION OF RENAE D. STEINER ON BEHALF OF
HEINS MILLS & OLSON, P.L.C.
IN SUPPORT OF INTERIM LEAD COUNSEL'S MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Renae D. Steiner, declare as follows:

1. I am a Partner with Heins Mills & Olson, P.L.C. I submit this declaration in support of Interim Lead Counsel's motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the above-captioned litigation (the "Action").
2. My firm is one of three firms appointed by the Court as Interim Lead Counsel for the Class in the Action.
3. The schedule attached as Exhibit A sets forth my firm's total hours and lodestar, computed at historical rates, for work performed on the Action from inception through June 30, 2025. The total number of hours spent by my firm during this period of time was 3,574.95, with a corresponding lodestar of \$2,642,762.50. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm.

4. In connection with its service as Interim Lead Counsel on behalf of the Class, my firm did the following, *inter alia*: my firm, along with Karon, LLC, Twenge + Twomley Law Firm, and McGowan Hood & Felder, LLC filed the first Complaint on behalf of a class of ready-mix concrete purchasers on behalf of our client, Pro Slab, Inc. Subsequently, the firms of CohanMalad and Preti Flaherty joined the litigation with their client Bremer Construction Management Inc. We jointly filed an Amended Complaint. Our client, Forrest Concrete, LLC joined later, and collectively these firms and clients filed the Second Amended Complaint and the currently operative Third Amended Complaint. My firm has played a key role in nearly every aspect of litigation since the case was filed in November 2017. Our firm participated in the opposition briefing to Defendants two rounds of motions to dismiss. Working with our co-counsel, my firm has participated in and directed the review of the hundreds of thousands of documents produced in this case and coordinated the collection of documents from our clients Pro Slab, Inc. and Forrest Concrete LLC. We briefed and argued discovery motions; have taken the Rule 30(b)(6) deposition of third-party Southeast Ready Mix, and the individual depositions of Evans' owners Tommy Strickland and Bo Strickland, Argos' former Divisional Manager David Howard, and Elite's owner, Trey Cook. Along with Scott Gilchrist of CohenMalad, I worked extensively on the econometric modeling issues, in the production of expert reports and in the depositions of Plaintiffs' economic expert, Dr. Russell Lamb, and Defendants' economic expert, Dr. Lawrence Wu. My firm was primarily responsible for drafting the class certification motion papers and selecting the evidence to be presented in that motion. In addition, my firm took the lead in drafting the mediation statements and selecting the evidence to be presented for the successful mediations with Evans and Thomas. Along with Co-Lead Counsel, I participated

in all aspects of settlement negotiations, and the drafting of settlement papers, including structuring the notice programs.

5. The lodestar amount reflected in Exhibit A is for work that was performed by attorneys and professional staff for the benefit of the Class, from July 31, 2017 through June 30, 2025. The hourly rates for the attorneys and professional staff reflected in Exhibit A are the usual and customary hourly rates historically charged by my firm in similar matters, except for time spent exclusively on document review, which Interim Lead Counsel capped at \$350 per hour.

6. My firm has expended a total of \$46,963.09 in unreimbursed costs and expenses in connection with the prosecution of the Action through June 30, 2025. These costs and expenses do not include my firm's assessment payments to the common cost litigation fund maintained by Interim Lead Counsel. These costs and expenses are set forth in the schedule attached as Exhibit B and are reflected on the books and records of my firm.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 19th day of August, 2025, in Minneapolis, Minnesota.

/s/Renae D. Steiner

Renae D. Steiner, Partner
HEINS MILLS & OLSON, P.L.C.

EXHIBIT A*Pro Slab, Inc., et al. v. Argos USA, Inc., et al.*

HEINS MILLS & OLSON, P.L.C.

Reported Hours and Historical Lodestar

Inception through June 30, 2025

NAME	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
Vincent J. Esades (P)	.80	\$950	\$760.00
Vincent J. Esades (P)	.30	\$800	\$240.00
Vincent J. Esades (P)	70.80	\$700	\$49,560.00
Renae D. Steiner (P)	1,198.90	\$950	\$1,136,865.00
Renae D. Steiner (P)	203.15	\$900	\$182,835.00
Renae D. Steiner (P)	952.80	\$800	\$762,240.00
Renae D. Steiner (P)	58.30	\$700	\$40,810.00
Jessica N. Servais (P)	112.90	\$650	\$73,385.00
Jessica N. Servais (P)	328.60	\$550	\$180,730.00
Irene M. Kovarik (PL)	23.40	\$275	\$6,435.00
Irene M. Kovarik (PL)	56.60	\$225	\$12,735.00
Sarah L. Maurer (PL)	4.60	\$200	\$920.00
Sarah L. Maurer (PL)	11.90	\$175	\$2,082.50
Heidi Richards (OA)	551.90	\$350	\$193,165.00
TOTAL	3,574.95		\$2,642,762.50

(P) Partner
(OC) Of Counsel
(A) Associate

(OA) Other/Contract Attorney

(LC) Law Clerk

(PL) Paralegal

EXHIBIT B*Pro Slab, Inc., et al. v. Argos USA, Inc., et al.***HEINS MILLS & OLSON, P.L.C.**

Reported Expenses Incurred on Behalf of Plaintiffs

Inception through June 30, 2025

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Court Costs/Filing Fees	\$834.45
Transcripts/Court Reports	\$0.00
Internal Reproduction/Copies	\$1,424.80
Commercial Copies	\$360.40
Computer Research (Lexis/Westlaw)	\$13,717.90
Telephone/Fax	\$13.12
Postage/Express/Delivery/Messenger	\$95.46
Professional/Expert/Consultant Fees	\$7,913.08
Witness/Service Fees	\$0.00
Travel (air/ground transportation, meals, lodging, etc.)	\$22,603.88
TOTAL:	\$46,963.09