

EXHIBIT 6

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 WILLIAM E. HOESE
IN SUPPORT OF INTERIM LEAD COUNSEL'S MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, William E. Hoese declare as follows:

1. I am a shareholder with Kohn, Swift & Graf, P.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 the Class Counsel for the Plaintiffs 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 1,129.20, with a corresponding lodestar of \$720,596.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm.

In connection with representing the Plaintiffs in the Action my firm did the following, *inter alia*:

- Researched and drafted a section of the opposition to the motion to dismiss.
- Researched and drafted a memorandum regarding the admissibility and authentication of tape recordings.
- Researched and drafted a memorandum regarding the use of guilty pleas at trial.
- Prepared objections to third party subpoenas, conducted legal research for a potential motion for a protective order, and met and conferred with defense counsel regarding subpoenas.
- Researched prisoner depositions and drafted a motion, memorandum in support, and a proposed order to authorize such depositions.
- Researched and drafted a memorandum regarding reconvening a deposition due to instructions not to answer.
- Supervised document coders, conducted quality control of the document coder work, reviewed coder memoranda regarding document review, provided feedback to coders, and reviewed, analyzed, and coded documents.
- Conducted targeted searches of certain individuals, issues, and communications from related cases and DOJ documents.
- Searched for class period conspiracy documents and price fixed bids.
- Document searches and review related to business decisions at Argos.
- Conducted searches for a chronology documents project.
- Searched documents for territorial and geographic coverage of certain individuals and drafted memoranda regarding the same.
- Conducted legal research regarding the status of Coastal, discovery deficiencies, and legal strategies with respect to Coastal.

- Participated in a recordings project and reviewed recordings.
- Researched Elite asset sales.
- Conducted document searches for discovery negotiations.
- Reviewed documents for use at depositions and for experts.
- Searched for price increase documents.
- Participated in a Rule 33(d) designation project regarding responsiveness.

4. The lodestar amount reflected in Exhibit A is for work that was assigned by Interim Lead Counsel and performed by attorneys and professional staff for the benefit of the Class. 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.

5. My firm has expended a total of \$2,712.26 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 11th day of August, 2025, in Philadelphia, Pennsylvania.



William E. Hoes

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

Kohn, Swift & Graf, P.C.

Reported Hours and Historical Lodestar

Inception through June 30, 2025

NAME	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
Joseph C. Kohn, (S) 2017	.8	\$750.00	\$ 600.00
Joseph C. Kohn (S) 2025	2.3	\$975.00	\$ 2,242.50
Douglas A. Abrahams (S) 2017	.2	\$700.00	\$ 140.00
Douglas A. Abrahams (S) 2018	.9	\$700.00	\$ 630.00
Douglas A. Abrahams (S) 2019	.4	\$725.00	\$ 290.00
Douglas A. Abrahams (S) 2020	.2	\$725.00	\$ 145.00
Douglas A. Abrahams (S) 2021	.3	\$725.00	\$ 217.50
Willam E. Hoesse (S) 2017	.1	\$700.00	\$ 70.00
William E. Hoesse (S) 2018	8.6	\$700.00	\$ 6,020.00
William E. Hoesse (S) 2019	9.4	\$725.00	\$ 6,815.00
Willam E. Hoesse (S) 2020	11.3	\$725.00	\$ 8,192.50
William E. Hoesse (S) 2021	23.9	\$725.00	\$ 17,327.50
Willam E. Hoesse (S) 2022	.1	\$725.00	\$ 72.50
William E. Hoesse (S) 2024	.5	\$900.00	\$ 450.00
William E. Hoesse (S) 2025	55.4	\$950.00	\$ 52,630.00
Steven P. Schwartz (S) 2018	104	\$675.00	\$ 70,200.00
Steven P. Schwartz (S) 2020	4.5	\$725.00	\$ 3,262.50
Craig W. Hillwig (S) 2020	642.60	\$650.00	\$ 417,690.00
Craig W. Hillwig (S) 2020	65.9	\$350.00	\$ 23,065.00
Craig W. Hillwig (S) 2021	120.2	\$650.00	\$ 78,130.00
Craig W. Hillwig (S) 2022	1.5	\$650.00	\$ 975.00
Craig W. Hillwig (S) 2023	1.0	\$650.00	\$ 650.00

NAME	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
Barbara Moyer (A) 2018	7.4	\$500.00	\$ 3,700.00
Zahra Dean (S) 2025	28.6	\$600.00	\$ 17,160.00
Elias A. Kohn (A) 2021	10.8	\$400.00	\$ 4,320.00
Stephen Z. Lehman (PL) 2021	22.8	\$195.00	\$ 4,446.00
Alex P. Minnonos (PL) 2025	5.5	\$210.00	\$ 1,155.00

TOTAL	1,129.2		\$ 720,596.00
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(S) Shareholder

(A) Associate

(PL) Paralegal

EXHIBIT B

Pro Slab, Inc., et al. v. Argos USA, Inc., et al.

Kohn, Swift & Graf, P.C.

Reported Expenses Incurred on Behalf of Plaintiffs

Inception through June 30, 2025

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Court Costs/Filing Fees	\$750.00
Internal Reproduction/Copies	\$735.60
Computer Research (Lexis/Westlaw)	\$1,222.10
Postage/Express/Delivery/Messenger	\$4.56
TOTAL:	\$2,712.26