

# **EXHIBIT 9**

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 GREGORY P. HANSEL  
IN SUPPORT OF INTERIM LEAD COUNSEL'S MOTION FOR AN  
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Gregory P. Hansel, declare as follows:

1. I am a Partner with Preti, Flaherty, Beliveau & Pachios, LLP. 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 11,410.80, with a corresponding lodestar of \$6,417,733.50. 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 played a primary role in all key aspects of the litigation since the case was initiated approximately eight years ago. These efforts have included both work within the Co-Lead Counsel group and in conjunction with the other class counsel to manage this complex litigation. Working with our Co-Lead Counsel Group, my firm has, *inter alia*, investigated the case, including by analyzing the market for ready-mix concrete in Greater Savannah; interviewed and vetted clients; attended Court hearings in this action and the related criminal action; conferred with the U.S. Department of Justice regarding this action and the related criminal action; cooperatively and efficiently organized and directed the work of our multiple co-counsel firms; taken a lead role in numerous depositions of Defendants (including, among others, the Rule 30(b)(6) depositions of Defendants Evans Concrete, LLC and Elite Concrete, LLC, and the federal penitentiary deposition of John David Melton); worked on the opposition briefing to Defendants' two rounds of comprehensive motions to dismiss; worked closely with Plaintiffs' economic expert, Dr. Russell Lamb, and served as the primary point of contact with Plaintiffs' industry expert, Professor Fabio Matta, Ph.D., to facilitate damages analysis and class certification and merits reports; assisted with organizing and leading the review and analysis of hundreds of thousands of pages of documents and extensive audio recordings produced in discovery; reviewed Defendants' discovery responses and participated in and led numerous meet-and-confers with Argos, Lafarge, and other Defendants regarding their responses; met and conferred with Defendants' counsel to resolve or attempt in good faith to resolve numerous pretrial motions, scheduling matters, and other issues; worked with all Plaintiffs to prepare for their depositions and defended Plaintiffs at those depositions; organized and participated in weekly Co-Lead Counsel calls to plan and discuss case strategy, establish task lists, and efficiently delegate any work appropriate for co-counsel firms; worked extensively on the assignment of claims by affiliates to Plaintiff Bremer Construction Management, LLC, and the substitution of Michelle L. Vieira, Chapter 7 Trustee of Forrest Concrete, LLC, as plaintiff in place of former Plaintiff Forrest Concrete, LLC; along with Co-Lead Counsel, participated in

numerous settlement negotiations and several mediations with Defendants, including those resulting in this settlement.

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. 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 \$203,647.39 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 Portland, Maine.

/s/ Gregory P. Hansel

Gregory P. Hansel, Partner

Preti, Flaherty, Beliveau & Pachios, LLP

**EXHIBIT A***Pro Slab, Inc., et al. v. Argos USA, Inc., et al.***Preti, Flaherty, Beliveau & Pachios, LLP**

Reported Hours and Historical Lodestar

Inception through June 30, 2025

NAME	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
Gregory P. Hansel (P) 2025	681.10	\$945	\$643,639.50
Gregory P. Hansel (P) 2024	282.80	\$895	\$253,106.00
Gregory P. Hansel (P) 2023	16.70	\$885	\$14,779.50
Gregory P. Hansel (P) 2022	8.30	\$865	\$7,179.50
Gregory P. Hansel (P) 2021	87.90	\$820	\$72,078.00
Gregory P. Hansel (P) 2020	181.80	\$820	\$149,076.00
Gregory P. Hansel (P) 2019	69.60	\$820	\$57,072.00
Gregory P. Hansel (P) 2018	161.50	\$780	\$125,970.00
Gregory P. Hansel (P) 2017	58.70	\$780	\$45,786.00
Michael S. Smith (P) 2025	505.20	\$880	\$444,576.00
Michael S. Smith (P) 2024	232.10	\$830	\$192,643.00
Michael S. Smith (P) 2023	42.30	\$790	\$33,417.00
Michael S. Smith (P) 2022	134.40	\$775	\$104,160.00
Michael S. Smith (P) 2021	591.20	\$685	\$404,972.00
Michael S. Smith (P) 2020	967.60	\$685	\$662,806.00
Michael S. Smith (P) 2019	107.10	\$685	\$73,363.50
Michael S. Smith (P) 2018	171.30	\$675	\$115,627.50
Michael S. Smith (P) 2017	20.00	\$675	\$13,500.00
Randall B. Weill (P) 2024	.30	\$895	\$268.50
Randall B. Weill (P) 2023	33.00	\$885	\$29,205.00
Randall B. Weill (P) 2022	55.10	\$865	\$47,661.50
Randall B. Weill (P) 2021	245.50	\$820	\$201,310.00

Randall B. Weill (P) 2020	182.50	\$820	\$149,650.00
Randall B. Weill (P) 2019	98.00	\$820	\$80,360.00
Randall B. Weill (P) 2018	174.60	\$780	\$136,188.00
Randall B. Weill (P) 2017	6.00	\$780	\$4,680.00
Bodie B. Colwell (P) 2025	19.80	\$675	\$13,365.00
Bodie B. Colwell (P) 2024	.40	\$675	\$270.00
Jonathan G. Mermin (OC) 2025	38.10	\$750	\$28,575.00
Jonathan G. Mermin (OC) 2024	13.70	\$715	\$9,795.50
Jonathan G. Mermin (OC) 2021	53.20	\$625	\$33,250.00
Jonathan G. Mermin (OC) 2020	23.90	\$625	\$14,937.50
Elizabeth F. Quinby (A) 2025	461.10	\$550	\$253,605.00
Elizabeth F. Quinby (A) 2024	130.90	\$525	\$68,722.50
Elizabeth F. Quinby(A) 2023	1.50	\$505	\$757.50
Elizabeth F. Quinby (A) 2022	42.80	\$495	\$21,186.00
Elizabeth F. Quinby (A) 2021	114.90	\$370	\$42,513.00
Elizabeth F. Quinby (A) 2020	269.70	\$370	\$99,789.00
Elizabeth F. Quinby (A) 2019	17.70	\$370	\$6,549.00
Michael D. Hanify (A) 2025	358.40	\$570	\$204,288.00
Michael D. Hanify (A) 2024	77.10	\$545	\$42,019.50
Eric G. Penley (A) 2019	36.60	\$470	\$17,202.00
Eric G. Penley (A) 2018	155.70	\$350	\$54,495.00
Eric G. Penley (A) 2017	8.90	\$350	\$3,115.00
Katherine A. Mail (A) 2020	11.00	\$250	\$2,750.00
Omar Frometa (A) 2025	4.00	\$400	\$1,600.00
Matthew Carlson (OA) 2021	1,232.00	\$350	\$431,200.00
Matthew Carlson (OA) 2020	1,342.90	\$350	\$470,015.00
Christine Jagde (OA) 2020	528.60	\$350	\$185,010.00
Sonja S. Belanger (PL) 2025	342.70	\$315	\$107,950.50

Sonja S. Belanger (PL) 2024	109.40	\$290	\$31,726.00
Sonja S. Belanger (PL) 2022	1.90	\$275	\$522.50
Sonja S. Belanger (PL) 2021	4.10	\$195	\$799.50
Sonja S. Belanger (PL) 2020	61.90	\$195	\$12,070.50
Sonja S. Belanger (PL) 2019	2.90	\$195	\$565.50
Sonja S. Belanger (PL) 2018	8.10	\$195	\$1,579.50
Brianna S. Clark (PL) 2025	125.80	\$305	\$38,369.00
Brianna S. Clark (PL) 2024	162.60	\$290	\$47,154.00
Brianna S. Clark (PL) 2023	16.00	\$280	\$4,480.00
Brianna S. Clark (PL) 2022	44.20	\$250	\$11,050.00
Brianna S. Clark (PL) 2021	94.40	\$195	\$18,408.00
Brianna S. Clark (PL) 2020	237.80	\$195	\$46,371.00
Brianna S. Clark (PL) 2019	47.10	\$195	\$9,184.50
Brianna S. Clark (PL) 2018	54.40	\$195	\$10,608.00
Brianna S. Clark (PL) 2017	2.00	\$195	\$390.00
Maria J. Maffucci (PL) 2021	4.90	\$195	\$955.50
Zoe V. Michalopoulos (PL) 2024	.60	\$255	\$153.00
Giselle S. Sillsby (PL) [2025]	32.50	\$225	\$7,312.50

TOTAL	11,410.80		\$6,417,733.50
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(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.***Preti, Flaherty, Beliveau & Pachios, LLP**

Reported Expenses Incurred on Behalf of Plaintiffs

Inception through June 30, 2025

**EXPENSE REPORT**

<b>CATEGORY</b>	<b>AMOUNT INCURRED</b>
Court Costs/Filing Fees	\$1,946.30
Transcripts/Court Reports	\$5,734.00
Internal Reproduction/Copies	\$512.80
Commercial Copies	\$7,783.48
Computer Research (Lexis/Westlaw)	\$9,355.75
Telephone/Fax	\$1,274.20
Postage/Express/Delivery/Messenger	\$1,577.50
Professional/Expert/Consultant Fees	\$127,752.40
Witness/Service Fees	\$
Travel (air/ground transportation, meals, lodging, etc.)	\$47,710.96
<b>TOTAL:</b>	<b>\$203,647.39</b>