

EXHIBIT 11

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 RUSSELL T. BURKE
IN SUPPORT OF INTERIM LEAD COUNSEL'S MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Russell T. Burke, declare as follows:

1. I am a Partner with Williams & Burke, P.A. 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 South Carolina Counsel for the Plaintiffs in the Action.

3. Prior to starting my firm, I worked on this Action on behalf of McGowan, Hood, Felder, & Phillips, LLC. My time on this matter for McGowan Hood is reflected in the submission of Chad McGowan.

4. 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 January 1, 2025 through June 30, 2025. The total number of hours spent by my firm during this period of time was 44.2

hours, with a corresponding lodestar of \$29,180.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm.

5. In connection with representing the Plaintiffs in the Action my firm did the same kinds of work that I had performed while with McGowan, Hood, including, *inter alia*: conferring regarding legal strategy and local rules; reviewing, editing and filing all pleadings, motions, and responses to motions; researching various procedural issues; corresponding with counsel and chambers concerning proposed orders and scheduling; and reviewing documents to be filed under seal and providing courtesy copies to chambers.

6. 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 antitrust matters.

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

Executed this 15th day of August, 2025, in Columbia, South Carolina.

s/Russell T. Burke

Russell T. Burke
Williams & Burke, P.A.
1320 Main Street, Suite 300
Columbia, SC 29201

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

Williams Burke, LLP

Reported Hours and Historical Lodestar

Inception through June 30, 2025

NAME	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
Russell Burke [P] [2025]	41.0	\$700.00	\$28,700
Kate Felter (PL)] [2025]	3.2	\$150	\$480.00
TOTAL	44.2		\$29,180.00

(P) Partner
(OC) Of Counsel
(A) Associate
(OA) Other/Contract Attorney
(LC) Law Clerk
(PL) Paralegal