

EXHIBIT 1

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 FREDERICK S. BERGEN, SR.
IN SUPPORT OF INTERIM LEAD COUNSEL'S MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, FREDERICK S. BERGEN, declare as follows:

1. I am a Senior Partner with Bergen & Bergen, 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 46, with a corresponding lodestar of \$23,000.00. This schedule was prepared from contemporaneous, daily time records prepared and maintained by my firm.

4. In connection with representing the Plaintiffs in the Action my firm did the following, *inter alia*: Meetings with client and counsel, interviews of witnesses, strategic

discussions and meetings including telephone conferences with co-counsel, numerous emails and correspondence with co-counsel and client, review pleadings, and two separate court appearances for presentation of victims impact statements at criminal sentencing in Savannah Federal Court, reviewing criminal transcripts of Savannah Federal Court trial.

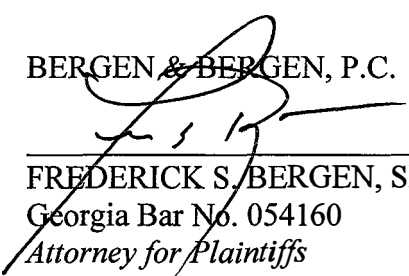
5. The lodestar amount reflected in Exhibit A is for work that was assigned by Interim Lead Counsel and performed by attorneys and professional staff for the benefit of the Class. The hourly rates for the attorneys and professional staff reflected in Exhibit A are the usual and customary hourly rates 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.

6. My firm has expended a total of \$257.85 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 14th day of August, 2025, in Savannah, Georgia

BERGEN & BERGEN, P.C.


FREDERICK S. BERGEN, SR.

Georgia Bar No. 054160

Attorney for Plaintiffs

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Savannah, Georgia 31401
(912) 233-6600
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EXHIBIT A*Pro Slab, Inc., et al. v. Argos USA, Inc., et al.*

BERGEN & BERGEN, P.C.

Reported Hours and Historical Lodestar

Inception through June 30, 2025

NAME	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
FREDERICK S. BERGEN, SR. 2017	14.0	\$500.00	\$7,000.00
FREDERICK S. BERGEN, SR. 2018	6.0	\$500.00	\$3,000.00
FREDERICK S. BERGEN, SR. 2019	3.0	\$500.00	\$1,500.00
FREDERICK S. BERGEN, SR. 2020	3.0	\$500.00	\$1,500.00
FREDERICK S. BERGEN, SR. 2021	1.0	\$500.00	\$500.00
FREDERICK S. BERGEN, SR. 2022	0	\$500.00	0.00
FREDERICK S. BERGEN, SR. 2023	1.0	\$500.00	\$500.00
FREDERICK S. BERGEN, SR. 2024	7.0	\$500.00	\$3,500.00
FREDERICK S. BERGEN, SR. 2025	11.0	\$500.00	\$5,500.00
TOTAL	46.0		\$23,000.00

(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.***BERGEN & BERGEN, P.C.**

Reported Expenses Incurred on Behalf of Plaintiffs

Inception through June 30, 2025

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Court Costs/Filing Fees	\$
Transcripts/Court Reports	\$
Internal Reproduction/Copies	\$151.50
Commercial Copies	\$
Computer Research (Lexis/Westlaw)	\$
Telephone/Fax	\$
Postage/Express/Delivery/Messenger	\$65.36
Professional/Expert/Consultant Fees	\$
Witness/Service Fees	\$
Travel (air/ground transportation, meals, lodging, etc.)	\$40.99
TOTAL:	\$257.85