

EXHIBIT 2

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 SCOTT D. GILCHRIST ON BEHALF OF
COHENMALAD, LLP IN SUPPORT OF INTERIM LEAD COUNSEL'S MOTION
FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Scott D. Gilchrist, declare as follows:

1. I am a Partner with CohenMalad, 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 January 1, 2017 through June 30, 2025. The total number of hours spent by my firm during this period of time was 9,347.30, with a corresponding lodestar of \$5,930,119.00. 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 has played a primary role in all or nearly all aspects of the litigation, including work directly

with other Lead Counsel as well as the direction and supervision of work performed by multiple supporting co-counsel firms. My firm engaged in extensive pre-suit investigation of the conspiracy underlying the Action, including the participants and the product and geographic market. We took the lead in preparing the First Amended Complaint and the expanded Second Amended Complaint. We participated in briefing Plaintiffs' opposition to Defendants' two rounds of motions to dismiss, briefed and presented arguments related to the Department of Justice (DOJ) motions to limit discovery and depositions, and worked with the DOJ and Defendants to address scheduling issues related to the stay. My firm has worked with other Lead Counsel and supporting firms to participate in and direct the review of the hundreds of thousands of documents produced in this case and dozens of audio recordings. We have drafted responses to Defendants' discovery requests, directed and coordinated the collection of documents from Plaintiff Bremer Construction Management and others, participated in extensive discovery-related negotiations with Defendants and non-parties, and have briefed and argued discovery motions. We prepared and served a subpoena and *Touhy* requests for documents on the DOJ and, together with co-Lead Counsel, engaged in extensive negotiations with DOJ concerning document production and the review of those documents. My firm has taken the Rule 30(b)(6) depositions of the Thomas and Argos Defendants, the deposition of James Pedrick, the prison deposition of Greg Melton, and two depositions of Defendants' expert Dr. Lawrence Wu. Together with co-Lead Counsel, we worked on the identification and collection of transactional and related data from Defendants and Plaintiffs, the production of expert reports by Plaintiffs' economic expert, Dr. Russell Lamb, the review and responses of Dr. Lamb to Defendants' economic expert Dr. Wu, and the depositions of Dr. Lamb by Defendants. My firm has also, with co-Lead Counsel, worked with Fabio Matta, Ph.D. in the production of an expert report on the

product and market characteristics of Concrete. My firm undertook substantial responsibility, together with co-Lead Counsel, in the drafting of Plaintiffs' motion for class certification and reply in support, and the preparation of supporting evidence. Along with Co-Lead Counsel, we participated in all aspects of settlement negotiations and mediations to date, including the drafting of mediation statements, settlement agreements and preliminary and final approval motions, the presentation of settlements to the Court, and assisting in structuring and executing settlement notice plans. My firm has also coordinated with DOJ counsel in matters related to the criminal case, including the preparation of victim impact reports on behalf of the proposed class.

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 January 1, 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 \$35,747.63 in unreimbursed costs and expenses in connection with the prosecution of the Action from January 1, 2017 through June 30, 2025. 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. They do not include my firm's assessment payments to the common cost litigation fund maintained by Interim Lead Counsel.

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 Indianapolis, Indiana.

/s/ Scott D. Gilchrist
Scott D. Gilchrist, Partner
CohenMalad, LLP

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

COHENMALAD, LLP

Reported Hours and Historical Lodestar

January 1, 2017 through June 30, 2025

NAME	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
David J. Cutshaw (P) (2021	0.40	\$500.00	\$200.00
Edward B. Mulligan (P) (2024)	2.00	\$775.00	\$1,550.00
Edward B. Mulligan (P) (2025)	128.90	800.00	\$103,120.00
Irwin B. Levin (P) (2017)	9.60	660.00	\$6,336.00
Irwin B. Levin (P) (2018)	77.00	780.00	\$60,060.00
Irwin B. Levin (P) (2019)	178.80	820.00	\$146,616.00
Irwin B. Levin (P) (2022)	2.90	865.00	\$2,508.50
Irwin B. Levin (P) (2023)	4.50	925.00	\$4,162.50
Irwin B. Levin (P) (2024)	48.80	950.00	\$46,360.00
Irwin B. Levin (P) (2025)	88.20	975.00	\$85,995.00
Lynn A. Toops (P) (2017)	1.00	575.00	\$575.00
Richard E. Shevitz (P) (2017)	8.50	660.00	\$5,610.00
Richard E. Shevitz (P) (2018)	67.90	700.00	\$47,530.00
Richard E. Shevitz (P) (2021-2022)	6.60	800.00	\$5,280.00
Richard E. Shevitz (P) (2023-2024)	8.70	900.00	\$7,830.00
Richard E. Shevitz (P) (2025)	7.70	950.00	\$7,315.00
Scott D. Gilchrist (P) (2017)	150.50	600.00	\$90,300.00
Scott D. Gilchrist (P) (2018-2020)	2130.70	700.00	\$1,491,490.00
Scott D. Gilchrist (P) (2021-2022)	754.60	800.00	\$603,680.00
Scott D. Gilchrist (P) (2023-2024)	569.60	900.00	\$512,640.00
Scott D. Gilchrist (P) (2025)	1287.40	950.00	\$1,223,030.00
Vess A. Miller (P) (2017)	2.40	575.00	\$1,380.00

Vess A. Miller (P) (2018)	57.00	675.00	\$38,475.00
Vess A. Miller (P) (2019-2020)	303.80	685.00	\$208,103.00
Vess A. Miller (P) (2021)	66.20	700.00	\$46,340.00
Vess A. Miller (P) (2022)	2.60	775.00	\$2,015.00
Elizabeth Hyde (A) (2018)	3.40	375.00	\$1,275.00
Lisa M LaFornara (A) (2018-2019)	15.10	450.00	\$6,795.00
Tyler B Ewigleben (A) (2018-2019)	12.00	450.00	\$5,400.00
April F Williams-Shaw (OA) (2020)	612.80	350.00	\$214,480.00
Chris M Griffin (OA) (2020-2021)	2718.10	350.00	\$951,335.00
Abby DeMare (LC) (2020)	7.50	110.00	\$825.00
Bei-Er Cheok (LC) (2017)	6.50	140.00	\$910.00
Madison T Hartman (LC) (2019)	2.80	95.00	\$266.00
Yaniv Shmukler (LC) (2017)	0.80	140.00	\$112.00
Kristine Marie Landeck (PL) (2021)	2.00	110.00	\$220.00

TOTAL	9347.30		\$5,930,119.00
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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.*

COHENMALAD, LLP

Reported Expenses Incurred on Behalf of Plaintiffs

January 1, 2017 through June 30, 2025

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Court Costs/Filing Fees	\$12.00
Transcripts/Court Reports	\$1,013.40
Internal Reproduction/Copies	\$0.00
Commercial Copies	\$117.58
Computer Research (Lexis/Westlaw)	\$2,407.99
Telephone/Fax	\$143.81
Postage/Express/Delivery/Messenger	\$304.38
Professional/Expert/Consultant Fees	\$6,157.00
Witness/Service Fees	\$0.00
Travel (air/ground transportation, meals, lodging, etc.)	\$25,591.47
TOTAL:	\$35,747.63