

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

IN RE SPECTRUM BRANDS SECURITIES LITIGATION)
)
) No. 19-cv-347-jdp
)
)

**DECLARATION OF DOUGLAS M. POLAND IN SUPPORT OF
LEAD COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES
AND LITIGATION EXPENSES, FILED ON BEHALF OF
STAFFORD ROSENBAUM LLP**

I, Douglas M. Poland, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner at the law firm of Stafford Rosenbaum LLP (“Stafford Rosenbaum”).¹ I submit this declaration in support of Lead Counsel’s application for an award of attorneys’ fees in connection with services rendered in the above-captioned class action (the “Action”), as well as for payment of expenses incurred by my firms in connection with the Action.²

2. From approximately April 2019 through and including July 31, 2020, Rathje Woodward acted as Liaison Counsel for Lead Plaintiffs the Public School Teachers’ Pension and Retirement Fund of Chicago and the Cambridge Retirement System and the Settlement Class, and from August 1, 2020 to the present, Stafford Rosenbaum has acted in that role. The firms participated in, among other tasks, reviewing and editing draft complaints, motions, and responses

¹ I became a partner of Stafford Rosenbaum on July 31, 2020. Prior to Stafford Rosenbaum, I was a partner at the law firm of Rathje Woodward LLC (“Rathje Woodward”). This declaration includes time and expenses incurred by Rathje Woodward personnel through July 31, 2020, and time and expenses incurred by Stafford Rosenbaum personnel from August 1, 2020-December 18, 2020.

² Unless otherwise defined herein, any capitalized terms shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated August 10, 2020, dkt. 44-1.

to Defendants' filings; preparing and filing various *pro hac vice* motions; ensuring compliance with the local rules, procedures, and practices of the Western District of Wisconsin; and preparing for and attending the remote mediation that took place on June 3, 2020.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by each Stafford Rosenbaum and Rathje Woodward attorney who worked on the litigation from its inception through and including December 18, 2020 and the lodestar calculation for those individuals based on my firm's current hourly rates. For personnel who are no longer employed by either firm, the lodestar calculation is based upon the hourly rates for such personnel in his or her final year of employment. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by Rathje Woodward and Stafford Rosenbaum. All time expended in preparing this application for fees and expenses has been excluded.

4. As the partner responsible for supervising my firms' work on this case, I reviewed these time and expense records to prepare this declaration. The purpose of this review was to confirm both the accuracy of the time entries and expenses and the necessity for, and reasonableness of, the time and expenses committed to the litigation.

5. Following this review, I believe that the time reflected in my firms' lodestar calculation and the expenses for which payment is sought as stated in this declaration are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, based on my experience in similar litigation, the expenses are all of a type that would normally be billed to a fee-paying client in the private legal marketplace.

6. The hourly rates for the Rathje Woodward and Stafford Rosenbaum attorneys included in Exhibit 1 are consistent with the hourly rates the firms charge for similar services in non-contingent complex litigation matters.

7. The firms' rates are set based on periodic analysis of rates charged by firms performing comparable work. Different timekeepers within the same employment category (e.g., partners, associates, paralegals, etc.) may have different rates based on a variety of factors, including years of practice, years at the firm, year in the current position (e.g., years as a partner), relevant experience, relative expertise, and the rates of similarly experienced peers at our firm or other firms.

8. The total number of hours expended on this litigation by Rathje Woodward and Stafford Rosenbaum from inception through and including December 18, 2020, is 42.70 hours. The total lodestar for both firms for that period is \$20,870.00. These lodestar figures are based upon the firms' hourly rates, which do not include charges for expense items.

9. As detailed in Exhibit 1, the firms are seeking payment of a total of \$444.76 in expenses incurred in connection with the prosecution of this Action from its inception through and including December 18, 2020.

10. The expenses incurred in this Action are reflected in the records of Rathje Woodward and Stafford Rosenbaum, which are regularly prepared and maintained in the ordinary course of business. These records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred.

11. I am the only attorney from Rathje Woodward or Stafford Rosenbaum who worked on this matter and is still currently employed by either firm. With respect to the standing of my current firm, attached hereto as Exhibit 2 is my brief biography.

I declare, under penalty of perjury, that the foregoing facts are true and correct.

Executed on: December 23, 2020

/s/ Douglas M. Poland _____
Douglas M. Poland

EXHIBIT 1

In re Spectrum Brands Securities Litigation
 No. 19-cv-347-jdp (W.D. Wis.)

STAFFORD ROSENBAUM LLP

TIME REPORT

Inception through and including December 18, 2020

NAME	HOURS	HOURLY RATE	LODESTAR
Partner			
Douglas M. Poland	39.50	\$500.00	\$19,750.00
Associate			
Alison E. Stites	3.20	\$350.00	\$1,120.00
TOTALS	42.70		\$20,870.00

EXHIBIT 2

In re Spectrum Brands Securities Litigation
No. 19-cv-347-jdp (W.D. Wis.)

STAFFORD ROSENBAUM LLP

EXPENSE REPORT

Inception through and including December 18, 2020

CATEGORY	AMOUNT
Court Fees	\$400.00
Online Legal Research	\$29.56
Online Factual Research	\$15.20
TOTAL EXPENSES:	\$444.76

EXHIBIT 3

In re Spectrum Brands Securities Litigation
No. 19-cv-347-jdp (W.D. Wis.)

STAFFORD ROSENBAUM LLP

FIRM BIOGRAPHY

Practice

Attorney Douglas M. Poland is a partner at Stafford Rosenbaum's Madison office. Doug's practice focuses on appellate law and complex litigation, with emphasis on business, contract, and real estate disputes; election and voting rights law; environmental toxic torts; products liability; and consumer fraud lawsuits.

Doug has decades of significant experience in complex litigation matters in state and federal courts in Wisconsin, Illinois, and throughout the United States. He has served as lead counsel in trials before federal, state, and administrative courts, as well as in alternative dispute resolution proceedings. He is a member of the bars of the United States Supreme Court, Wisconsin Supreme Court, Illinois Supreme Court, and various federal appellate and district courts across the country.

Doug also counsels clients on regulatory and pre-litigation issues. Doug served as co-lead trial counsel for plaintiffs who successfully challenged the Wisconsin Assembly legislative districts before three-judge federal panels in 2012 and 2016, and is one of the members of the legal team that represented the respondents before the U.S. Supreme Court in *Gill v. Whitford*. Doug also served as lead counsel for plaintiffs in *Lewis v. Bostelmann*, who obtained a preliminary injunction in federal court extending the deadline to return mail-in absentee ballots in Wisconsin's 2020 spring election by six days. Doug co-chairs Stafford Rosenbaum's Election and Political Law practice group with Attorney Jeff Mandell.

Doug has been a [Best Lawyer](#) since 2010 in the practice areas of Commercial Litigation, Environmental Litigation, Mass Tort Litigation / Class Actions (Defendants), and Product Liability Litigation (Defendants); the added honor of having a Best Lawyers Lawyer of the Year distinction has been awarded to Doug for 2021. He also has been named a [Super Lawyer](#) since 2012 in the practice areas of Business Litigation, Class Action/Mass Torts (Defense), Civil Rights, Environmental Litigation, and Products Personal Injury (Defense).

Doug is admitted to practice in Wisconsin; Illinois; the U.S. District Courts for the Eastern and Western Districts of Wisconsin, Northern District of Illinois, Eastern District of Michigan, and District of Colorado; the U.S. Court of Appeals, Seventh Circuit; and the U.S. Supreme Court.

Education

- Loyola University Chicago School of Law (J.D., 1994, *summa cum laude*)
- U.S. District Court for the Northern District of Illinois/U.S. Circuit Court of Appeals for the Seventh Circuit, Judicial Extern to the Hon. Ilana D. Rovner (1992-1993)
- Northwestern University (B.A., 1988, *departmental honors in History*)

Presentations and Publications

- Douglas Poland & Jeffrey Mandell, Federal appeals court checks the legislature's expanding power, *Wisconsin Examiner*, November 19, 2019
- Douglas Poland & Jeffrey Mandell, Partial Veto is a deliberate check on legislative power, *Wisconsin Examiner*, Aug. 29, 2019
- Democracy in the Balance: The Future of Gerrymandering and What It Means for Your Practice, IADC Midyear Meeting (2019)
- *Whitford v. Gill* and Ending Partisan Gerrymandering, Milwaukee Rotary Club (2016)
- South-Central Wisconsin Electronic Discovery Summit (2013)
- Yucca Mountain Update/American College of Radiology's Appropriateness Criteria, North Central Chapter Health Physics Society Spring Meeting (2010)

- DRI Toxic Torts and Environmental Law Seminar (Program Chair) (2010)
- Yucca Mountain Update, North Central Chapter Health Physics Society Spring Meeting (2009)
- Radiation Litigation: An Overview and Recent Developments, Health Physics Society 53rd Annual Meeting (2008)
- What They Didn't Teach You In Law School, Meeting of the James E. Doyle Inn of Court (2008)
- The Chemical Products Liability Trial: Winning At Every Stage (2007)
- Managing Product Liability Risk in the U.S. Marketplace Council of Great Lakes Governors' Forum on Chinese Trade & Investment in the Great Lakes Region (2007)
- Evidence of Juror Misconduct and Its Effect on Jury Deliberations and Verdicts, Meeting of the James E. Doyle and Thomas E. Fairchild Inns of Court (2007)
- Recent Developments in Radiation Litigation, Health Physics Society 51st Annual Meeting (2006)
- Recent Developments in Radiation Litigation, Health Physics Society 50th Annual Meeting (2005)
- Douglas M. Poland, People v. DiGuida: Freedom of Expression on Private Property Under the Illinois Constitution, 24 Loyola Univ. Chicago Law Rev. 524 (1993)

Professional Memberships and Community Involvement

- Downtown Madison, Inc.
 - Board Chair (2019-present)
 - Board Vice-Chair (2017-2018)
 - Board Member (2011-present)
 - Chair, Ad Hoc Inclusiveness Committee (2015-2017)
 - Chair, Transportation and Parking Committee (2012-2016)
 - Chair, Bicycle Subcommittee (2011-2012)
- Madison's Central Business Improvement District
 - Board Member (2019-present)
- James E. Doyle Inn of Court, Member, Programming Committee (2015-present)
- John Knox Presbytery
 - Personnel Committee (2016-present)
 - Presbytery Council, Chair (2015-16)
 - Presbytery Council Member (2011-2016)
 - Presbytery Council Technology Committee, Chair (2011-2016)
- Covenant Presbyterian Church
 - Ruling Elder (2008-present)
 - Chair, Technology Committee (2013-2016)
 - Session, Ruling Elder Member (2008-2011)
- Vilas Neighborhood Association, Member, Edgewood Neighborhood Liaison Committee (2014-2018)
- Monroe Street Fine Arts Center
 - Capital Campaign Committee (2019-2020)
 - Board President (2012-2015)
 - Board Member (2007-2015)
- City of Madison South Capitol District Planning Committee, Citizen Member (2013-2014)
- DRI Toxic Torts and Environmental Law Committee, Annual Seminar Program
 - Chair (2010-2011)