

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

CATHERINE DUFFY, MATTHEW	:	
EDLIN, LAWRENCE MULCAHY,	:	
PAULA HALL, individually and on	:	
behalf of all others similarly situated,	:	No.3:24-cv-388-BJB
	:	
Plaintiffs,	:	
	:	
MAZDA MOTOR OF AMERICA, INC.	:	CLASS ACTION
D/B/A MAZDA NORTH AMERICAN	:	
OPERATIONS AND MAZDA MOTOR	:	
CORPORATION,	:	
	:	JURY TRIAL DEMANDED
DEFENDANTS.	:	
	:	

**DECLARATION OF TROY M. FREDERICK IN SUPPORT OF PLAINTIFFS’
MOTION FOR ATTORNEYS’ FEES, EXPENSES, AND SERVICE AWARDS**

I, Troy M. Frederick, declare as follows:

1. I am a partner at the law firm of Frederick Law Group, PLLC and a member in good standing of the bars of the Pennsylvania State Supreme Court and the Arizona State Supreme Court. I submit this declaration in support of Plaintiffs’ Motion for Attorneys’ Fees, Expenses, and Service Awards in this action, as memorialized in the Settlement Agreement previously filed with the Court.¹ I make the following declaration based on my own personal knowledge and, if called upon as a witness, I could and would competently testify as follows.

EFFORTS IN THIS LITIGATION

2. The Settlement, if approved, would resolve all claims of Plaintiffs and Settlement Class Members against Mazda and the Released Parties related to an alleged defect in the Mazda Connect infotainment system.

¹ Unless otherwise noted, all capitalized terms not separately defined herein have the meaning ascribed to them in the Settlement Agreement. See ECF No. 18-1.

3. Undersigned counsel were involved in the initial factual investigation of this matter, edited, drafted, and reviewed filings, conducted research, and attended the hearing on the Court's preliminary approval of this class action settlement.

CLASS COUNSELS' REASONABLE LODESTAR

4. Class Counsel have contributed time and effort pursuing this matter on behalf of Plaintiffs and the Class.

5. To date, my firm has committed 29.3 hours for a lodestar total of \$21,975.00 prosecuting this matter for Plaintiffs and the Class. The hourly rates of counsel and our firm are their customary rates and are consistent with those utilized for lodestar cross-check purposes.

6. The timekeepers at our law firm billed the following hours from the inception of this case through June 10, 2025.

FREDERICK LAW GROUP, PLLC-LODESTAR REPORT				
NAME	TITLE	HOURLY RATE	TOTAL HOURS	LODESTAR
Troy M. Frederick, Esq	Partner	\$750.00	25.75	\$19,312.50
Beth A. Frederick, Esq.	Partner	\$750.00	3.55	\$2,662.50
TOTAL:			29.3	\$21,975.00

7. This time was kept contemporaneously with billable work as it was performed on the case. Based on our experience in similar cases, I am of the opinion that this time was reasonable and necessary to the prosecution and resolution of a case of this type.

8. Detailed records of our time are available to the Court *in camera* upon request.

THE CLASS REPRESENTATIVE SERVICE AWARDS

9. I believe the proposed service awards for the Class Representatives in the amounts of \$4,000 to Catherine Duffy and \$2,500 to each Matthew Edlin, Lawrence Mulcahy, and Paula Hall are fair and are reasonable given my knowledge of the case and my professional experience

with Class Action matters.

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

Executed this 10th day of June 2025, in Indiana County, Pennsylvania.

Signature:

Frederick Law Group, PLLC


Troy M. Frederick, Esquire