EXHIBIT 12

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re Flint Water Cases	No. 5:16-cv-10444-JEL-MKM HON. JUDITH E. LEVY MAG. MONA K. MAJZOUB

DECLARATION OF VINCENT J. WARD IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

Pursuant to 28 U.S.C. § 1746, I, Vincent J. Ward, hereby declare as follows:

1. I own and operate The Ward Law Firm in Albuquerque, New Mexico. Previously I was a partner at Freedman Boyd Hollander & Goldberg ("FBHG."). I was employed by either FBHG or The Ward Law Firm for the duration of my work on this matter. I was appointed to serve as sub-class counsel on behalf of adults. I have personal knowledge of the matters stated in this Declaration.

2. I provide this declaration in support of Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. More specifically, I describe the time invested and expenses incurred by FBHG and The Ward Law Firm in the prosecution of this action for the common benefit of plaintiffs in the Flint Water Cases (including but not limited to the Class Plaintiffs) from inception through November 30, 2023.

3. Over the course of this litigation, FBHG and the Ward Law Firm have

been involved in the extensive mediation and settlement negotiation process involving several meetings among counsel with the leadership of the Special Master. As counsel for the adult sub-class, I spent considerable time evaluating the strengths and weaknesses of the personal injury claims of adults impacted by the lead exposure. For example, I reviewed documents and conducted legal research to determine the type of claims that could be brought by adults, whether causation could be proven, and what types of damages individual claimants could expect to receive if litigated through trial. For this analysis I conducted research that is typical of personal injury attorneys. For example, I examined the cost of past and future medical treatment, evaluated proof and evidentiary challenges, and considered the novelty of some of the claims. This was especially important since the parties' proposed method for allocating settlement proceeds among the adult sub-class required that I form an opinion about the high and low end of a potential damage award for the various and often disparate injuries that were experienced across the adult sub-class. Through this work I was able to determine that the allocation of proceeds to adults, and the proposed plan of allocation, was fair, equitable, and proportionate.

4. The total number of hours expended on this litigation by FBHG and The Ward Law Firm for the common benefit of plaintiffs in the Flint Water Cases (including but not limited to the Class Plaintiffs) from inception through November

30, 2023 is 196.8 hours. The total lodestar for this work using current billing rates is $78,362.50. The lodestar using applicable historical billing rates is $64,075.00.

5. FBHG and The Ward Law Firm expended 5 hours of time between February 16, 2021 and November 30, 2023.

6. Attached as Exhibit A is a detailed summary indicating the time spent by my firm's attorneys and professional staff who worked on this litigation, and their lodestars based on FBH's and The Ward Law Firm's current billing rates from inception of the case through November 30, 2023. Attached as Exhibit B is a detailed summary indicating the time spent by my firm's attorneys and professional staff who worked on this litigation, and their lodestars based on FBHG's and The Ward Law Firm's historical billing rates from inception of the case through November 30, 2023. Additionally, attached as Exhibit C is a detailed summary indicating the time spent and lodestar accrued by FBHG and the Ward Law Firm on this litigation from inception of the case through November 30, 2023, categorized by task. FBHG and The Ward Law Firm prepared these schedules from contemporaneously made daily time records regularly prepared and maintained by the timekeepers identified in these exhibits. The records were kept and categorized in accordance with the Case Management Order Regarding Time and Expense Procedures (ECF No. 507) and were submitted regularly to the Special Master in accordance with that Order. The hourly rates reflected in Exhibits A and B are the same as the usual and customary

hourly rates charged for FBHG's and The Ward Law Firm's services on a contingent basis in similar complex class action litigation and have been approved by courts in other class action cases.

7. The total amount of unreimbursed expenses incurred by FBHG and The Ward Law Firm directly (*i.e.* not through the Class Litigation Fund) in connection with the prosecution of this litigation from inception through November 30, 2023 is $5,389.18. I have attached as Exhibit D a breakdown by category of these expenses. These are reflected on FBHG's and The Ward Law Firm's books and records. The books and records are prepared from expense vouchers, receipts, invoices, check and bank records, and other source materials, and represent an accurate recordation of the expenses incurred. The expenses reflected in Exhibit D were reasonably incurred and necessary and appropriate in the prosecution of this litigation and were for the common benefit of the plaintiffs (including but not limited to the Class Plaintiffs) in the Flint Water Cases.

8. FBHG and The Ward Law Firm have not incurred any expenses between February 16, 2021 and November 30, 2023.

9. The time and expense records described herein were reviewed by my firm for accuracy, duplicate entries, and compliance with the provisions of the Court's Time and Expense Case Management Order Regarding Time and Expense Procedures (ECF No. 507) concerning common benefit work and expenses.

10. Upon request from the Court, FBHG and The Ward Law Firm are prepared to submit for *in camera* review the daily time records and expense documentation supporting Exhibits A, B, C and D.

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

Executed on December 14, 2023
Vincent J. Ward

Vincent J. Ward

Exhibit A: FBH/The Ward Law Firm Lodestar at Current Billing Rates

Professional	Position	Current Rate	Cumulative Hours	Cumulative Lodestar
Jennifer N. Higuera*	L	$125	1.3	$162.50
Vincent J. Ward	P	$400	195.5	$78,200.00
TOTAL			196.8	$78,362.50

P	Partner
C	Counsel
A	Associate
L	Legal Assistant
I	Intern

* Former employee, rate stated as of the end of the employment.

Exhibit B: FBH/The Ward Law Firm Lodestar at Historical Billing Rates

Professional	Position	Historical Rate	Cumulative Hours	Cumulative Lodestar
Jennifer N. Higuera*	L	$125	1.3	$162.50
Vincent J. Ward	P	$325	190.5	$61,712.50
Vincent J. Ward	P	$400	5	$2,000.00
TOTAL			196.8	$64,075.00

P	Partner
C	Counsel
A	Associate
L	Legal Assistant
I	Intern

* Former employee, rate stated as of the end of the employment.

Exhibit C: FBH/The Ward Law Firm Lodestar by Task

Task	Hours	Lodestar
1. Administration (data and file management)	4.3	$1,137.50
2. Document Review	38.5	$12,528.75
3. Legal Research	6	$1,950.00
4. Pleadings, Briefs and Pretrial Motions		
5. Other Discovery		
6. Deposition Prep/Take/Defend		
7. Experts/Consultants		
8. Case Vetting/Bellwether		
9. Class Certification		
10. Trial Preparation and Trial		
11. Court Appearances/Arguments before the Court		
12. Litigation Strategy and Case Management		
13. Settlement	84.7 ($325.00 per hour) 5 ($400.00 per hour)	$27,543.75 $2,000.00
14. Travel	24.5	$7,962.50
15. Committee Meetings or Calls	33.8	$10,952.50
16. Lead Counsel/PEC/Liaison Counsel Duties		
17. Time and Expense Admin		
18. Appeal		
TOTAL	196.8	$64,075.00

Exhibit D: FBH/The Ward Law Firm Litigation Expenses

Expense	Amount
1. Postage, shipping, courier, certified male	
2. Printing and photocopying (in-house)	
3. Computerized research – Lexis/Westlaw (actual charges only)	
4. Telephone – long distance (actual charges only)	
5. Travel (pursuant to travel limitations)	
6. Airfare (pursuant to travel limitations)	$3,372.97
7. Reasonable ground transportation (pursuant to travel limitations)	$191.67
8. Hotel (pursuant to travel limitations)	$1,621.40
9. Reasonable meals	$132.14
10. Other reasonable and necessary charges (e.g., parking)	$71.00
TOTAL	$5,389.18