EXHIBIT 8

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 TERESA A. CAINE BINGMAN IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

Pursuant to 28 U.S.C. § 1746, I, Teresa A. Caine Bingman, hereby declare as follows:

1. I am the managing partner and sole owner of the law firm Law Offices of Teresa A. Bingman ("TBLaw"). I have served as co-counsel in the above captioned matter since January 2017 and as a member of the Plaintiff's Executive Committee for the Interim Class since October 2017 and a member of the Settlement Negotiation Team for the Interim Class. 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 incurred by TBLaw 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 February 16, 2021 through November 30, 2023.

3. Over the course of this litigation, TBLaw has been involved in the

following specific activities:

- *Pleadings:* Researching and reviewing Class Plaintiffs' complaints, motions, trial and appellate briefs for federal and state levels.
- *Research and Data*: Identification of, interview and coordination with several researchers who informed the work and development of expert evaluations and reports.
- *Mediation and Settlement:* TBLaw assisted with the vetting of individuals to recommend to serve as mediators. Following the appointment of the Mediators in January 2018, TBLaw was engaged in assisting with a portion of the mediation summaries and participating in the extensive, multi-year mediation, settlement negotiations and conversations related to the claims process involving in-person meetings, conference calls and email correspondence.
- *Strategy and Planning:* In coordination with co-counsel, TBLAW has participated in leadership calls to develop case strategies and plan and assess case status and ensure the efficient management of tasks.

4. I have reviewed information regarding prevailing hourly rates for attorneys with my experience handling similar or analogous cases, including the State Bar of Michigan's 2020 *Economics of Law Practice* report. For attorneys in the Ingham County area, who are partners and have comparable experience and reputation, the hourly rates are between $546 and $750 per hour. There is no category for complex or class litigation set forth in the 2020 economic law report, however the standard billing rate for civil litigation for attorneys in the 95th percentile is $600 per hour, and the rate for plaintiff personal injury attorneys is $750 per hour.

5. The request for $550 per hour is based upon my background,

credentials, qualifications, experience, skills, and reputation as an attorney, is consistent with rates that have been previously approved and awarded in state and federal court in class actions and complex litigation for attorneys with comparable experience through fee awards or as a result of contingent fee arrangements. A copy of my current resume accompanies this declaration.

6. The total number of hours expended on this litigation by TBLaw for the common benefit of plaintiffs in the Flint Water Cases (including but not limited to the Class Plaintiffs) from February 16, 2021 through November 30, 2023 is 313.100 hours. The total lodestar for this work using current billing rate is $172,205.00.

7. Attached as Exhibit A is a detailed summary indicating the time I spent working on this litigation, and my lodestar based on TBLaw's billing rate from February 16, 2021 through November 30, 2023. Additionally, attached as Exhibit B is a detailed summary indicating the time spent and lodestar accrued by TBLAW on this litigation from February 16, 2021 through November 30, 2023, categorized by task. TBLAW 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).

8. The total amount of unreimbursed expenses incurred by TBLaw directly (*i.e.* not through the Class Litigation Fund) in connection with the prosecution of this

litigation from February 16, 2021 through November 30, 2023 is $5,701.67. I have attached as Exhibit C, a breakdown by category of these expenses. These expenses are reflected on TBLAW'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 C 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.

9. Upon request from the Court, TBLaw is prepared to submit for *in camera* review the daily time records supporting Exhibits A, B and C.

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

Executed on December 7, 2023
Okemos, Michigan

/s/ Teresa A. Caine Bingman
Teresa A. Caine Bingman

Exhibit A: TBLAW Lodestar

Professional	Position	Rate	Cumulative Hours	Cumulative Lodestar
Bingman, Teresa	Partner	$550	313.100	$172,205.00
TOTAL			313.100	$172,205.00

Exhibit B: TBLAW Lodestar by Task

Task	Hours	Lodestar
1. Administration (data and file management)		
2. Document Review	1.5	$825
3. Legal Research	1.5	$825
4. Pleadings, Briefs and Pretrial Motions		
5. Other Discovery		
6. Deposition Prep/Take/Defend		
7. Experts/Consultants	2.6	$1430
8. Case Vetting/Bellwether		
9. Class Certification		
10. Trial Preparation and Trial		
11. Court Appearances/Arguments before the Court	20.05	$11,027.50
12. Litigation Strategy and Case Management		
13. Settlement	75.2	$41,360
14. Travel	4.5	$2475
15. Committee Meetings or Calls	184.55	$101,502.50
16. Lead Counsel/PEC/Liaison Counsel Duties	5	$2,750
17. Time and Expense Admin	18.2	$660
18. Appeal	313.10	$172,205
TOTAL		

Exhibit C: TBLAW Litigation Expenses

Expense	Amount
1. Postage, shipping, courier, certified mail	
2. Printing and photocopying (in-house)	$1425
3. Computerized research - Lexis/Westlaw (actual charges only)	
4. Cell Phone – partial billing for monthly charges ($3500) and Zoom ($476.67)	$3976.67
5. Travel (pursuant to Travel Limitations)	$300
6. Airfare (pursuant to Travel Limitations)	
7. Reasonable ground transportation (pursuant to Travel Limitations)	
8. Hotel - (pursuant to Travel Limitations)	
9. Reasonable meals	
10. Other reasonable and necessary charges (e.g., parking)	
TOTAL	**$5,701.67**