EXHIBIT 13

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re Flint Water Cases	No. 5:16-cv-10444-JEL-EAS HON. JUDITH E. LEVY MAG. ELIZABETH A. STAFFORD

DECLARATION OF PAUL F. NOVAK IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

Pursuant to 28 U.S.C. § 1746, I, Paul F. Novak, hereby declare as follows:

1. I am the managing attorney of the Detroit office of the law firm of Weitz & Luxenberg, P.C. ("WL"). My firm and I were Court-appointed to serve on Plaintiffs' Executive Committee for the Proposed Class, (ECF No. 234), in the above captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. I provide this declaration in support of Plaintiff Counsel's Application for an Award of Attorneys' Fees and Reimbursement of Expenses. More specifically, I describe the time invested and expenses incurred by WL 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 June 30, 2023.

3. My firm, primarily through myself, and attorneys John Broaddus and Gregory Stamatopoulos, has served as counsel to the Plaintiffs from the outset of

this litigation and has been involved in every aspect of the prosecution, including briefing, discovery, court appearances, motion arguments, appeals, and settlement. During the period of February 16, 2021, through June 30, 2023, WL has been involved in the following specific activities:

- Detailed monitoring of the Bellwether I trial with periodic reports to the Class Plaintiffs' Counsel Executive Committee.
- Coordination of all expert work associated with the Class Plaintiff experts responsible for opining on the exposure of Class members to contaminated Flint water and the resulting adverse health impacts, of Class members, including:
    - Assistance with experts on development of expert reports;
    - Preparation of expert witnesses for multiple depositions;
    - Drafting of all briefing in response to *Daubert* challenges for experts related to Class member exposure and adverse human health impacts; and
    - Preparation and participation in oral arguments on selected *Daubert* motions.
- Assisting with drafting portions of Class Plaintiffs' successful opposition to Veolia Defendants' Summary Judgment motion.
- Serving as the primary liaison with Class Representatives with respect to ongoing discovery disputes.
- *Strategy and Planning:* WL attorneys have contributed to strategic decision, planning, and administrative discussions throughout the litigation in relation to discovery efforts, development of expert witness reports, settlement strategy, and administrative issues.

4. The total number of hours expended on this litigation by WL for the common benefit of plaintiffs in the Flint Water Cases (including but not limited to

the Class Plaintiffs) from February 16, 2021, through June 30, 2023, is 2,582.7 hours. The total lodestar for this work using current billing rates is $1,768,532.50. The total lodestar for this work using historical WL billing rates is $1,676,050.

5. 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 WL's *current* billing rates. 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 WL's *historical* billing rates. Additionally, attached as Exhibit C is a detailed summary indicating the time spent and lodestar accrued by WL on this litigation from February 16, 2021, through June 30, 2023, categorized by task, and based on WL's *current* billing rates. WL 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 to the Special Master in accordance with that Order. The hourly rates reflected in Exhibits A, B, and C are the same as the usual and customary hourly rates charged for WL's services on a contingent basis in similar complex class action litigation and have been approved by courts in other class action cases.

6. The total amount of unreimbursed expenses incurred by WL directly

(*i.e.* not through the Class Litigation Fund) in connection with the prosecution of this litigation from February 16, 2021, through June 30, 2023 is $8,802.83. I have attached as Exhibit D a breakdown by category of these expenses. These are reflected in WL'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.

7. 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.

8. Upon request from the Court, WL is 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 6, 2023
Detroit, Michigan

/s/ Paul F. Novak
Paul F. Novak

Exhibit A: WL Lodestar at Current Billing Rates

Professional	Position	Rate	Cumulative Hours	Cumulative Lodestar
*Broaddus, John	P	$850	1,175.4	$999,090
*Kennedy, Paulina	A	$350	271.6	$95,060
Khan, Shirin	L	$225	92	$20,700
*Littman, Syndy	L	$225	0.3	$67.50
*McDowell, Katelyn	A	$325	18	$5,850
Novak, Hanna	L	$225	228.4	$51,390
Novak, Paul	P	$850	479.7	$407,745
Stamatopoulos, Gregory	A	$675	241	$162,675
Thal Verville, Casey	A	$350	61.3	$21,455
VanSlyke, Benjamin	A	$300	15	$4,500
TOTAL			2,582.7	$1,768,532.50

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

P	Partner or their equivalent
C	Counsel
A	Associate
L	Legal Assistant
I	Intern

Exhibit B: WL Lodestar at Historical Billing Rates

Professional	Position	Year	Rate	Cumulative Hours	Cumulative Lodestar
*Broaddus, John	P	2021	$800	371.9	$297,520
*Broaddus, John	P	2022	$825	799.9	$659,917.50
*Broaddus, John	P	2023	$850	3.6	$3,060
*Kennedy, Paulina	A	2022	$325	120.9	$39,292.50
*Kennedy, Paulina	A	2023	$350	150.7	$52,745
Khan, Shirin	L	All	$225	92	$20,700
*Littman, Syndy	L	All	$225	0.3	$67.50
*McDowell, Katelyn	A	2022	$325	18	$5,850
Novak, Hanna	L	All	$225	228.4	$51,390
Novak, Paul	P	2021	$800	204.2	$163,360
Novak, Paul	P	2022	$825	81	$66,825
Novak, Paul	P	2023	$850	194.5	$165,325
Stamatopoulos, Gregory	A	2021	$450	157.5	$70,875
Stamatopoulos, Gregory	A	2022	$650	68.5	$44,525
Stamatopoulos, Gregory	A	2023	$675	15	$10,125
Thal Verville, Casey	A	2022	$325	59.3	$19,272.50
Thal Verville, Casey	A	2023	$350	2	$700
VanSlyke, Benjamin	A	2022	$300	15	$4,500
TOTAL				2,582.7	$1,676,050

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

P	Partner or their equivalent
C	Counsel
A	Associate
L	Legal Assistant
I	Intern

Exhibit C: WL Lodestar by Task

Task	Hours	Lodestar
1. Administration (data and file management)	675.3	$566,443
2. Document Review	2	$1,438
3. Legal Research	297.8	$250,268
4. Pleadings, Briefs and Pretrial Motions	289.3	$187,455
5. Other Discovery	97.8	$42,043
6. Deposition Prep/Take/Defend	61.9	$38,377.50
7. Experts/Consultants	618.5	$396,976
8. Case Vetting/Bellwether	70.9	$60,265
9. Class Certification	10.1	$7,710
10. Trial Preparation and Trial	73	$25,600
11. Court Appearances/Arguments before the Court	12.2	$7,070
12. Litigation Strategy and Case Management	42.6	$28,460
13. Settlement	247.1	$86,785
14. Travel	3.5	$2,363
15. Committee Meetings or Calls	76.1	$63,373.50
16. Lead Counsel/PEC/Liaison Counsel Duties	3.5	$2,975
17. Time and Expense Admin		
18. Appeal	1.1	$935
TOTAL	2,582.7	$1,768,532.50[1]

[1] In calculating WL lodestar by task, we encounter a $4.50 discrepancy. To account for this, the total lodestar reflected in Exhibit C has been adjusted to mirror the total lodestar reflected in Exhibit A ($4.50 has been subtracted from $1,768,537, for a consistent lodestar total of $1,768,532.50).

Exhibit D: WL Litigation Expenses

Expense	Amount
Copying costs	
FedEx/Messenger/Postage	
Telephone/Teleconferences/Fax	
Computer research	$6,435.27
Court costs/service of process/hearing transcripts	
Transportation (air, rail, local)	$1,025.67
Food and lodging while travelling	$214.89
Other	$1,341.89
TOTAL	$8,802.83