EXHIBIT 4

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 PERETZ BRONSTEIN IN SUPPORT OF PLAINTIFFSS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

Pursuant to 28 U.S.C. § 1746, I, Peretz Bronstein, hereby declare as follows:

1. I am a member of the law firm Bronstein, Gewirtz & Grossman, LLC ("BG&G"). I am a member of Plaintiffs' Executive Committee ("PEC"), serving under the leadership of Interim Co-Lead Counsel Theodore J. Leopold and Michael L. Pitt. 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 BG&G 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 1, 2021 through November 30, 2023.

3. Since the time of the Settlement, BG&G has been involved primarily in assisting Claimants process Settlement Claims. In

addition, BG&G, as a member of the Plaintiffs' Executive Committee, continues to spend time monitoring the litigation, reading pleadings and occasionally attending status conferences with the Court.

4. The total number of hours expended on this litigation by BG&G for the common benefit of plaintiffs in the Flint Water Cases (including but not limited to the Class Plaintiffs) from February 1, 2021 through November 30, 2023 is 5679.5 hours. The total lodestar for this work is $1,849,810. Throughout its work on the matter, BG&G has kept its billing rates for this matter constant at its initial billing rates. BG&G has not received any payment to date for this work.

5. Attached as Exhibit A is a detailed summary indicating the time spent by the firm's attorneys and professional staff who worked on this litigation, and their lodestars based on BG&G's billing rates from February 1, 2021 through November 30, 2023. Additionally, attached as Exhibit B is a detailed summary indicating the time spent and lodestar accrued by BG&G on this litigation from February 1, 2021 through November 30, 2023, categorized by task. BG&G prepared these schedules from contemporaneous 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 Exhibit A are the same as or less than the usual and customary hourly rates

charged for BG&G's services on a contingent basis in similar complex class action litigation and have been approved by courts in other class action cases.1

6. The total amount of unreimbursed expenses incurred by BG&G directly (i.e. not through the Class Litigation Fund[2]) in connection with the prosecution of this litigation from February 1, 2021 through November 30, 2023 is $7,783.15. I have attached as Exhibit C a breakdown by category of these expenses. These are reflected on BG&G'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."

7. The time and expense records described herein were reviewed each month by firm attorneys 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

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[1] *See, e.g.*, *Hartsock v. Spectrum Pharms., Inc.*, No. 2:16-cv-02279 (D. Nev.), ECF Nos. 156-4, 163; *In re Patriot Nat'l, Inc. Secs. Litig.*, No. 1:17-cv-01866 (S.D.N.Y.), ECF Nos. 136-6, 151; *Duncan v. Joy Global Inc.*, No. 2:16-cv-01229 (E.D. Wis.), ECF Nos. 64, 78.

[2] Additional $300,000.00 expense paid by BG&G which will be submitted by Lead Counsel.

and expenses. Time and expense records were submitted monthly to Special Master Deborah Greenspan and Interim Co- Lead Counsel.

8. Upon request from the Court, BG&G is prepared to submit for *in camera* review the daily time records and expense documentation supporting Exhibits A, B, and C.

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

Executed on December 6, 2023
New York, New York

/s/ Peretz Bronstein
Peretz Bronstein

Exhibit A: BG&G Lodestar

Professional	Position	Current Rate	Cumulative Hours	Cumulative Lodestar
Anderson, Iris	LC	300	205	$61,500.00
Bronstein, Aaron	L	300	1467.2	$366,800.00
Bronstein, Peretz	P	945	359.4	$334,863.00
Feldman, Nava	C	700	99.4	$69,580.00
Grossman, Neil	P	950	6	$5,400.00
Jerome, Debbie	O	350	153	$53,550.00
Karp, Avremi	L	265	547.4	$148,839.00
Katman, Mendy	C	600	20	$14,000.00
Kimelman, Eitan	P	800	49	$32,380.00
Meyteles, Yakov	L	250	65	$16,250.00
Miller, Nathan	L	300	1305.5	$351,040.00
Mirreghabie, Negeen	O	350	82.1	$28,735.00
Nathanson, Yael	LC	300	1.2	$420.00
Okunov, Zalmy	L	250	364.9	$91,225.00
Palace, David	C	600	111	$77,700.00
Renzo, Paul	O	350	32	$11,200.00
Schwey, Baruch	L	250	431.3	$107,825.00
Shapiro, Moishy	L	250	49.8	$12,450.00
Soloveichik, Yitzchak	P	945	0.8	$7,079.00
Zirkind, Menachem	L	250	235.9	$58,975.00
TOTAL			**5679.5**	**$1,849,810.00**

p	Partner
C	Counsel
A	Associate
L	Legal Assistant
LC	Law Clerk
0	Contract

Exhibit B: BG&G Lodestar by Task

Task	Hours	Lodestar
1. Administration (data and file management)		
2. Document Review	49.3	$15,380.00
3. Legal Research	10.5	$9,450.00
4. Pleadings, Briefs and Pretrial Motions	5.3	$4,770.00
5. Other Discovery		
6. Deposition Prep/Take/Defend	47.7	$38,230.00
7. Experts/Consultants		
8. Case Vetting/Bellwether	5.4	$4,860.00
9. Class Certification	2.9	$2,610.00
10. Trial Preparation and Trial	142.4	$73,070.00
11. Court Appearances/Arguments before the Court	20.5	$18,030.00
12. Litigation Strategy and Case Management	2.9	$2,610.00
13. Settlement	5153	$1,466,660.00
14. Travel		
15. Committee Meetings or Calls	13	$9,245.00
16. Lead Counsel/PEC/Liaison Counsel Duties	220.7	$199,970.00
17. Time and Expense Admin	5.9	$4,925.00
18. Appeal		
TOTAL	5679.5	$1,849,810.0

Exhibit C: BG&G Litigation Expenses

Expense	Amount
1. Postage, shipping, courier, certified mail	$567.65
2. Printing and photocopying (in-house)	$57.93
3. Computerized research - Lexis/Westlaw (actual charges only)	$172.30
4. Telephone - long distance (actual charges only)	$4,085.39
5. Travel (pursuant to Travel Limitations)	
6. Airfare (pursuant to Travel Limitations)	$595.80
7. Reasonable ground transportation (pursuant to Travel Limitations)	$496.47
8. Hotel - (pursuant to Travel Limitations)	
9. Reasonable meals	$200.51
10. Other reasonable and necessary charges (e.g., parking)	$1,607.10
TOTAL	$7,783.15

Exhibit D: BG&G Lodestar at Historical Billing Rates

Professional	Position	Year	Historical Rate	Cumulative Hours	Cumulative Lodestar
Anderson, Iris	LC	2023	300	205	$61,500.00
Bronstein, Aaron	L	2021	250	646.7	$161,675.00
Bronstein, Aaron	L	2022	250	820.5	$205,125.00
Bronstein, Peretz	P	2021	900	178.7	$160,830.00
Bronstein, Peretz	P	2022	900	152	$136,800.00
Bronstein, Peretz	P	2023	945	39.4	$37,233.00
Feldman, Nava	C	2021	700	23.5	$16,450.00
Feldman, Nava	C	2022	700	75.9	$53,130.00
Grossman, Neil	P	2021	900	6	$5,400.00
Jerome, Debbie	O	2021	350	153	$53,550.00
Karp, Avremi	L	2022	250	387.7	$96,925.00
Karp, Avremi	L	2023	265	195.9	$51,914.00
Katzman, Mendy	C	2022	700	20	$14,000.00
Kimelman, Eitan	P	2021	600	25.2	$15,120.00
Kimelman, Eitan	P	2022	600	15.7	$9,420.00
Kimelman, Eitan	P	2023	800	9.8	$7,840.00
Meyteles, Yakov	L	2021	250	65	$16,250.00
Miller, Nathan	L	2021	250	339.4	$84,850.00
Miller, Nathan	L	2022	250	702.6	$175,650.00
Miller, Nathan	L	2023	300	301.8	$90,540.00
Mirreghabie, Negeen	O	2021	350	82.1	28,735.00
Nathanson, Yael	LC	2022	350	1.2	$420.00
Okunov, Zalmy	L	2021	250	47.4	$11,850.00
Okunov, Zalmy	L	2022	250	317.5	$79,375.00
Palace, David	C	2021	700	111	$77,700.00
Renzo, Paul	O	2021	350	32	$11,200.00
Schwey, Boruch	L	2021	250	431.3	$107,825.00
Shapiro, Moishy	L	2021	250	44.5	$11,125.00
Shapiro, Moishy	L	2022	250	5.3	$1,325.00
Soloveichik, Yitzchak	P	2021	900	0.1	$90.00

Professional	Position	Year	Historical Rate	Cumulative Hours	Cumulative Lodestar
Soloveichik, Yitzchak	P	2022	900	0.1	$90.00
Zirkind, Menachem	L	2022	250	235.9	$58,975.00

p	Partner
C	Counsel
A	Associate
L	Legal Assistant
LC	Law Clerk
0	Contract