EXHIBIT 7

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 SETH R. LESSER IN SUPPORT OF PLAINTIFF COUNSEL'S APPLICATION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

Pursuant to 28 U.S.C. § 1746, I, SETH R. LESSER, hereby declare as follows:

1. I am a member of the Bar of this Court and am a partner in the law firm of Klafter Lesser LLP ("KL") (formerly Klafter Olsen & Lesser LLP until March 1, 2021). I was appointed by the Court as Interim Subclass Settlement Counsel for a Future Manifesting Injury Subclass. ECF No. 929. Pursuant to this appointment, I was an active participant in the settlement negotiation process, both in terms of the deliberations of the Subclass Settlement Counsel ("SCC") among themselves, and with all the parties to the negotiations that led to the proposed settlement. I have personal knowledge of the matters stated in this declaration.

2. The substance of this declaration is largely the same as the one I previously submitted and filed in support of the prior application for an award of fees and costs, which, for me, was dated March 2, 2021. and which was current through February 15, 2021 (ECF No. 1458.14). This otherwise updates my firm's time and expenses since that declaration. In here, I describe the time invested and expenses incurred by myself, with others in my 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 February 15, 2021, and, then at paragraphs __-__, below, since that date through November 30, 2023.

3. One thing worth noting at the outset is that unlike nearly all other counsel representing parties before the Court, given the nature of my appointment as an independent third-party attorney

without prior connection to the litigation, my recompense for my time and service as a Court-appointed Subclass Settlement Counsel will solely be from any award arising from this common benefit application inasmuch as I have no clients in this litigation from whom I will be obtaining any fee. This is also true, I believe, as to the other Subclass Settlement Counsel.

4. After my appointment by the Court in August of 2019, while I have had experience in mass toxic tort litigation, in order to be able to exercise my role as a subclass allocation counsel, I first began by speaking with a potential subclass representative, and thereupon reviewed a package of scientific, medical, epidemiological and other materials provided to the Subclass Settlement Counsel by the Plaintiffs' Steering Committee ("PSC") which also included materials relevant to the history of the litigation of this and the other parallel cases. I then went beyond those materials by obtaining yet other materials relating to the relevant medical concerns and spoke with several leading experts in the field so as to be able to evaluate the nature of future manifesting injuries, as well as what could be done to ameliorate the risks and to address such injuries should they manifest. I also spoke to individuals with knowledge as to the programs that presently exist and that might continue hereafter to exist that provide services to Flint residents, including adults and children, to evaluate, on a going forward basis, what evaluative and ameliorative programs existed and would continue to exist. In addition, I spoke to Lead Counsel, individual members of the PSC, and, after proposals were formulated vis-à-vis allocation, with Liaison Counsel and the Special Master regarding these matters as well as related issues regarding funding or insurance to ensure maximum potential payments for future-arising (i.e., manifesting) injuries and claims. In order to do this work most cost efficiently, I was aided by an associate at my firm, Morgan Stacey, who summarized materials for me, handled organizing paperwork, setting up meetings, and obtaining follow-up information and the like, and also by a legal assistant at my first. All of this work is detailed in the firm's contemporaneous time records, which include

the time detail for the work that was undertaken by me, Ms. Stacey, and a legal assistant, which was contained in the periodic reports reported by my firm to the Special Master in accordance with the Case Management Order Regarding Time and Expense Procedures (ECF No. 507).

5. In addition, I took a leading role from October 2019 into February 2021 in organizing the Subclass Settlement Counsel though email communications, telephone conferences, and an in-person meeting in late January at which we developed a proposed plan of allocation. Thereafter, I continued to play a leading role among the Subclass Settlement Counsel in taking that proposal to Lead Counsel, Liaison Counsel, the Special Master, and the State's counsel, and, with two Subclass Settlement Counsel, being involved in multiple conferences between these groups and individuals concerning the proposed allocation, as well as related issues concerning a settlement injury "grid" and how, in a settlement agreement, the various subclasses or groups (for minors for whom there would be no class) would be best handled. There was substantial back and forth between the Subclass Counsel, including me, and the State and Liaison Counsel and the Special Master as to the structure of any settlement, the allocated amounts, and the nature of any claims process. Indeed, for some time, I, along with one or two of the other Subclass Counsel, were at points at the center of the negotiations in terms of working out the ultimate "grid" and the manner in which different criteria would be used. This work was all necessarily intertwined with representing those individuals who may have first-time or exacerbated future manifesting injuries and my input was informed by the work described in paragraphs 3 and 4.

6. More specifically, the work I undertook included, but was not limited to, (1) consulting with Lead Counsel and PSC with respect to possible appointment and preparing materials for Court with respect to same; (2) upon appointment, reviewing the materials provided by the PSC, including historical review of the origins and impacts of the Flint Water Crisis,

medical literature, reports from experts, and demographic analysis, as well as talking to potential subclass representative and obtaining representation authority from same; (3) obtaining and reviewing medical literature; (4) consulting with experts regarding the health effects of lead on the Flint population, including arranging teleconferences with same for me and other SCC members; (5) reviewing census information from the Special Master and comparing to demographic materials; (6) consulting, with other SCC members, Flint Registry personnel, including Dr. Hanna-Attisha; (7) throughout time of engagement, organizing calls and disseminating materials to the other SCC members; (8) having discussions with the State's counsel to discuss potential forms of programmatic relief; (9) consulting with members of the PSC to determine local concerns that might be impacted by forms of relief; (10) reviewing the scope and specifics of other lawsuits and settlement to determine how to structure possible relief for non-manifest injury individuals; (11) researching possible avenues of programmatic relief and discussing same with experts, PSC members, Lead Counsel, and the State's counsel, including review of present programs and possible avenues of future funding; (12) reviewing insurance possibilities for funding aspects of future relief and correspondence and conferences with Ms. Greenspan regarding the same; (13) preparing materials for distribution at in person and teleconference meetings, including meetings at Detroit Airport, in Phoenix, and in Ann Arbor, and attending same and negotiating on behalf of non-manifest injury individuals at same; (14) preparing a summary memorandum of SCC position following SCC allocation meeting and disseminating same to Lead Counsel, Liaison Counsel, and the Special Master; (15) discussing and negotiating allocation issues with Liaison Counsel and the Special Master and with the State's counsel both prior to and after the final allocation negotiating meeting in Ann Arbor on behalf of non-manifest injury individuals, such negotiating relating to, among other things, programmatic relief and school programs; (16) reviewing and consulting with Messrs. Colfax and Cobden

regarding the injury matrix and multiple issues regarding same; (17) taking part in negotiations with Lead Counsel, Liaison Counsel, and the Special Master regarding the injury matrix and aspects of its inclusion for reaching settlement; (18) at behest of Lead Counsel, addressing and researching and negotiating aspects of ensuring protection of children's interests and ensuring legal forms of representation of children in Settlement Agreement drafts; (19) reviewing, commenting upon, and suggesting revisions to drafts of the Settlement Agreement at the behest of Lead Counsel; discussing same with SCC members; and negotiating same with Lead Counsel, Liaison Counsel, and the Special Master; (20) reviewing, and agreeing to, final versions of drafts of Settlement Agreement; and (21) preparing and submitting a declaration in support of preliminary approval and class structure.

7. Accordingly, before, during and after the settlement meeting arranged by the Special Master on February 12 in Ann Arbor, at which the essential parameters of the Settlement allocation were reached and in which I convinced the State, over its disinclination to do so, to include a provision for programmatic relief (as had been strongly recommended by the experts and others I had consulted), I was involved in the development and negotiation of the ultimate Settlement presented to the Court and which the Court has preliminarily approved. In that decision, I might note, the Court wrote that "Co-Lead Class, as well as Subclass Settlement Counsel—who have provided declarations supporting the allocation and attesting to its fairness—have lived up to their appointments in vigorously representing Plaintiffs through the litigation and settlement processes." ECF No. 1399 at 46.

8. Subsequent to the Settlement being reached, in November 2020, I prepared and submitted a declaration supporting Plaintiffs' motion for certification of a settlement class. ECF No. 1319-7.

9. Since the date of my prior declaration, my firm spent recorded time in following-

up on inquiries relative to the status of the litigation and settlement(s), which time was all in 2021 totaled 9.93 hours, as shown in Exhibits A, B, and C hereto. Although there has been other follow-up time spent, it has been episodic and small and, in any event, was not recorded.

10. As shown, the total lodestar for this work using current billing rates is $5,889.75 and using applicable historical billing rates is $5,499.25. The billing rates – current and historical – are those charged by me and my firm to paying clients; in addition, the hourly rates are also the same as the usual and customary hourly rates charged for my and KL's services on a contingent basis in similar complex class action litigation and have been accepted and approved by federal district courts in other class, mass tort, and collective action settlements. The time records were maintained contemporaneously, kept and categorized in accordance with the Case Management Order Regarding Time and Expense Procedures (ECF No. 507). All of this time was expended on a contingent basis with, as noted, the only likelihood of being paid being this common fund application since neither I, nor my firm, will be receiving any fee from any individual clients. Time spent on this application is not included.

11. In terms of expenses, since February 2021, the only expense of my firm was some Pacer expenses, which totaled $7.50. This was reflected in Pacer charge expenses that can be made available upon inspection, if the Court so desires. The expenses were all reasonably incurred and necessary and appropriate in the rendering of my services as Subclass Settlement Counsel on behalf of the common benefit of the plaintiffs in the Flint Water Cases.

12. 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.

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

Executed on December 5, 2023
Rye Brook, New York

/s/ Seth R. Lesser
Seth R. Lesser

Exhibit A: Seth Lesser/KL Lodestar at Current Billing Rates

Professional	Position	Current Rate	Cumulative Hours	Cumulative Lodestar
Lesser, Seth	P	$1,075	3.55	$3,816.25
Myra Monteagudo*	L	$325	6.38	$2,073.50
TOTALS			**9.93**	**$5,889.75**

P	Partner
C	Counsel
A	Associate
L	Legal Assistant
I	Intern

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

Exhibit B: Seth Lesser/KL Lodestar at Historical Billing Rates

Professional	Position	Year	Historical Rate	Hours	Lodestar
Lesser, Seth	P	2021	$965	3.55	$3,425.75
Monteagudo, Myra	L	2022	$325	6.38	$2,073.50
TOTALS				**9.93**	**$5,499.25**

P	Partner
C	Counsel
A	Associate
L	Legal Assistant
I	Intern

Exhibit C: Seth Lesser/KL Lodestar by Task

Task	Hours	Lodestar
Settlement	9.93	$5,889.75
TOTAL	**9.93**	**$5,889.75**

Exhibit D: KL Litigation Expenses

Expense	Amount
Computer research (Pacer)	$7.50
TOTAL	**$7.50**