

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS: COMMERCIAL DIVISION**

_____)	Master Index No. 711788/2018
IN RE ALTICE USA, INC. SECURITIES)	
LITIGATION)	Commercial Division
)	
_____)	Hon. Joseph Risi, J.S.C.

**AFFIRMATION OF WILLIAM C. FREDERICKS IN SUPPORT OF LEAD COUNSEL’S
APPLICATION FOR ATTORNEYS’ FEES AND LITIGATION EXPENSES**

I, William C. Fredericks, hereby affirm as follows:

1. I am a partner in the law firm of Scott+Scott Attorneys at Law LLP (“Scott+Scott” or the “Firm”). I submit this affirmation (the “Affirmation”) in support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses. I have personal knowledge of the facts sets forth herein, and if called upon, could and would testify thereto.

2. This Affirmation is supported by the Firm’s accounting records maintained in the ordinary course of business. The information in this Affirmation was prepared by my firm’s staff and reviewed by me. As part of my review, I exercised billing judgment to direct that various time entries be reduced or excluded (in particular by eliminating the time of all those who billed less than ten hours to this Action, and that certain other time entries be reduced or eliminated to ensure that only time properly chargeable to this matter was included. I believe the remaining time (and expenses) as reflected in the Exhibits attached hereto are all for work and expenses that were reasonable and necessary for the effective and efficient prosecution and resolution of the Action. In addition, I believe that these expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

3. Exhibit 1 summarizes the time spent by each Firm attorney and each member of its professional support staff on the prosecution of the Action, from its inception through

November 8, 2021, after making the reductions referenced in the preceding paragraph. Exhibit 1 also includes a lodestar calculation, which was determined by multiplying hours by the current billing rates for each listed attorney or paraprofessional. For attorneys and paraprofessionals no longer employed by my Firm, their lodestar is based on their billing rates in their final year of employment with my Firm. Exhibit 1 was prepared from daily time records prepared by the relevant timekeepers and maintained by my Firm.

4. The hourly billing rates set forth in the Exhibit 1 reflect the usual and customary hourly billing rates of my firm which have been submitted to and accepted by courts in other securities or shareholder litigation. My Firm's billing rates do not, however, include most litigation expenses, which are recorded separately and are set forth in Exhibit 2.

5. The total number of hours spent by my Firm on this matter, after making the reductions and exclusions previously referenced, is 1,545.5 hours. *See* Exhibit 1. My Firm's total lodestar for these hours is \$1,195,382. *Id.*

6. Litigation expenses incurred by my Firm, as summarized in Exhibit 2, total \$45,152.58. These expenses are of a type that in my experience are customarily reimbursed by courts in connection with this type of class action litigation, and that were reasonably necessary to the prosecution of this Action.

7. Set forth below is additional summary information regarding the largest categories of expenses for which my Firm seeks reimbursement:

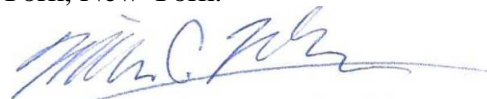
- (a) Experts: \$17,492.90. This sum reflects two items. First, it includes amount paid to Prof. Vladimir Atanasov, the Thomas L. Owen Professor at the Raymond A. Mason School of Business at the College of William & Mary, for his work (a) reviewing portions of the Proposed First Amended Consolidating Complaint and (b) performing analyses to determine, from a financial economics perspective, whether a reasonable investor would expect the price of Altice USA's shares to decline in response to adverse disclosures by its parent company. Second, it includes amounts paid to Valuescope, Inc., Plaintiffs' consulting damages and loss causation expert firm.

- (b) Mediation Costs: \$11,375. This amount reflects my Firm's allocated share of the fees charged by the independent mediator in this matter, Mr. Gregory Lindstrom of Phillips ADR.
- (c) Online Legal and Factual Research: \$5,127.60. These reflect costs associated with services provided by Westlaw and certain data vendors which my Firm used in connection with this Action. For example, my Firm used various third-party databases to access (inter alia) SEC filings, analyst reports, and news report, and (in the case of Westlaw) to perform legal research.
- (d) Filing, Witness and Other Fees: \$4,143.40. These expenses include amounts paid to the Court for filing fees, and to firms or individuals in connection with the service of summonses and complaints.
- (e) Duplicating: \$2,194. This sum reflects my Firm's \$0.25 per-copy charges for making photocopies in-house in connection with the Action, as tracked by our in-house billing system (which requires that a case code be entered for all copies made).
- (f) Discovery Platform Costs: \$1,902.60. In connection with this case, my Firm retained JND eDiscovery, a vendor that provides electronic discovery services through the Relativity platform, to help the Firm store, sort, and review electronically stored information that Defendants produced in connection with this Action.

8. The expenses pertaining to this case for which reimbursement is sought are reflected in the books and records of my Firm. These books and records are prepared from receipts, expense vouchers, check records and other documents, which provide an accurate record of the expenses for which reimbursement is sought.

I declare, under the penalty of perjury, that the foregoing facts are true and correct.

Executed on January 20, 2022, in New York, New York.



William C. Fredericks

PRINTING SPECIFICATIONS STATEMENT

1. Pursuant to 22 N.Y.C.R.R. §202.70(g), Rule 17, the undersigned counsel certifies that the foregoing affirmation was prepared on a computer using Microsoft Word. A proportionally spaced typeface was used as follows:

Name of Typeface: Times New Roman
Point Size: 12
Line Spacing: Double

2. The total number of words in the memorandum, inclusive of point headings and footnotes and exclusive of the caption, signature block, and this Certification, is 874 words.

DATED: January 20, 2022

Respectfully submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ William C. Fredericks

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*Co-Lead Counsel and Attorneys for
Plaintiff Anthony Fiore*

EXHIBIT 1**LODESTAR REPORT**

Inception through November 8, 2021

Timekeeper	Position	Hourly Billing Rate	Hours	Lodestar
William Fredericks	Partner	\$1,150	295.0	\$ 339,250.00
Thomas Laughlin	Partner	\$995	183.4	\$ 182,483.00
David Scott	Partner	\$1,295	26.0	\$ 33,670.00
Michael Burnett	Partner	\$1,095	17.0	\$ 18,615.00
Randy Moonan	Associate	\$650	438.5	\$ 285,025.00
Jeffrey Jacobson	Associate	\$550	197.0	\$ 108,350.00
Rhiana Swartz	Associate	\$750	113.9	\$ 85,425.00
Lauren McCabe	Associate	\$725	80.8	\$ 58,580.00
Kaitlin Steinberger	Paralegal	\$395	86.9	\$ 34,325.50
Toby Saviano	Paralegal	\$395	28.3	\$ 11,178.50
Dylan Gatzke	Paralegal	\$395	14.3	\$ 5,648.50
Kimberly Jager	Paralegal	\$395	16.7	\$ 6,596.50
Sinai Megibow	Investigator	\$550	47.7	\$ 26,235.00
TOTAL			1,545.50	\$ 1,195,382.00

EXHIBIT 2
EXPENSE REPORT

EXPENSE	AMOUNT
Filing, Witness and Other Fees	\$ 4,134.40
Discovery Platform	\$ 1,902.60
Work-Related Transportation, Hotels & Meals	\$ 975.62
Long-Distance Telephone, Facsimile & Conference Calling	\$ 513.31
Messenger, Overnight Delivery, Postage	\$ 298.80
Mediation	\$ 11,375.00
Duplicating - photocopies @ 0.25/page	\$ 2,194.00
Online Legal and Factual Research	\$ 5,127.60
Press Releases	\$ 1,111.50
Experts	\$ 17,492.90
Staff Overtime	\$ 26.85
TOTAL	\$ 45,152.58