

EXHIBIT E

1 Milberg, PLLC
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6 *Counsel for Plaintiffs and the Proposed Class*

7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**

10
11 AGUSTIN CACCURI et al., on behalf of
12 themselves and all others similarly situated,

13 *Plaintiffs,*

14 v.

15 SONY INTERACTIVE ENTERTAINMENT
16 LLC,

17 *Defendant.*

Case No. 21-cv-03361-AMO

**DECLARATION OF PEGGY WEDGWORTH
IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Honorable Araceli Martínez-Olguín

1 I, Peggy Wedgworth hereby declare as follows:

2 1. I am of counsel at Milberg, PLLC (“Milberg”), and counsel for the class and class
3 representative Allen Neumark who Milberg represented through February 17, 2023. I am admitted
4 to the practice of law in the state of New York. This Declaration is submitted in support of Class
5 Counsel’s Motion for Attorneys’ Fees, Expenses, and Service Awards. As the primary attorney at
6 Milberg, who was responsible for the Firm’s work in this matter, I have personal knowledge of the
7 facts below and, if called upon to do so, could and would testify competently thereto. I make this
8 declaration pursuant to 28 U.S.C. Section 1746 in support of Plaintiffs’ Motion for Attorneys’ Fees,
9 Expenses, and Service Awards.

10 2. Milberg is an experienced class action, antitrust, and complex civil litigation firm. I
11 have been sole lead, co-lead, and members of the executive committee or plaintiffs’ steering
12 committee on antitrust matters in various business sectors, including most recently *In re Dealer*
13 *Management Systems Antitrust Litigation*, 18-cv-00864 (N.D. Ill.) (MDL No. 2687); *In re Google*
14 *Play Consumer Antitrust Litigation*, 20-cv-05761(N.D. Cal.) (MDL No. 2687); *In re Deere &*
15 *Company Repair Services Antitrust Litigation*, 3:22-cv-50188 (N.D. Ill.) (MDL No. 3030). Milberg
16 attorneys have been sole lead, co-lead, and members of the executive committee or plaintiffs’
17 steering committee in other areas of the law including securities and data breach.

18 Work Performed for the Benefit of the Settlement Class

19 3. Milberg has participated in the prosecution of this litigation on behalf of the
20 Settlement Class. The work performed by the firm at the direction of Lead Counsel included:

- 21 • Investigation, Complaint and Initiation of Litigation: Milberg undertook
22 significant efforts to develop the factual basis and legal claims of Plaintiffs in this
23 case. Milberg investigated the allegations and drafted a complaint which was
24 filed as a class action complaint on behalf of Allen Neumark and all other
25 similarly situated video game purchasers.
- 26 • Dispositive Motions: Milberg worked on the Motion to Dismiss opposition
27 including legal research and writing and preparation for the hearing.

A. Lodestar Summary

4. Milberg attorneys and staff kept contemporaneous records of the time they spent on this litigation. Reports that reflect the contemporaneous time entries for the work performed by Milberg personnel were drafted and reviewed by Milberg attorneys and regularly provided Class Counsel for their review throughout the course of the litigation. Lead Counsel and my office have audited my firm's daily time records to ensure compliance. Lead Counsel is authorized to submit my firm's time records for *in camera* review if requested by the Court.

5. The total number of hours spent by Milberg prosecuting this litigation through December 31, 2025, is **220** with a corresponding lodestar at historical rates of **\$176,971.80**. The lodestar does not include any time related to the appointment of class counsel proceedings, or after December 31, 2025.

6. The following summary chart identifies the individuals who worked on this matter, their titles (Senior Partner, Partner, Associate, Paralegal), the total number of hours they worked, their historic hourly billing rates, and their total lodestar. Additional detail concerning the work performed by each of these individuals is set forth below.

Timekeeper	Title	Hours	Rate (Historical)	Lodestar
Alex Straus	Partner	2	\$764.00	\$1,528.00
Amanda Mkamanga	Paralegal	0.5	\$208.00	\$104.00
Amanda Mkamanga	Paralegal	0.5	\$225.00	\$112.50
Amber Brashear	Paralegal	0.2	\$239.00	\$47.80
Amber Brashear	Paralegal	0.1	\$258.00	\$25.80
Andrea Dorado	Associate	6	\$381.00	\$2,286.00
Andrei Rado	Partner	1.5	\$919.00	\$1,378.50
Arthur Stock	Partner	1.4	\$919.00	\$1,286.60
Ashleigh Hudson	Paralegal	3.4	\$208.00	\$707.20
Blake Yagman	Associate	13.5	\$468.00	\$6,318.00
Blake Yagman	Attorney	0.6	\$508.00	\$304.80
Cathy Bryant	Paralegal	4	\$225.00	\$900.00
Cathy Bryant	Paralegal	0.5	\$239.00	\$119.50

Christina Marrero	Paralegal	6	\$208.00	\$1,248.00
Dana Scott	Paralegal	0.4	\$239.00	\$95.60
Elizabeth McKenna	Partner	75.1	\$850.00	\$63,835.00
Elizabeth McKenna	Partner	40.5	\$919.00	\$37,219.50
Elizabeth McKenna	Partner	9.2	\$997.00	\$9,172.40
Elizabeth McKenna	Partner	5.8	\$1,057.00	\$6,130.60
John Hughes	Partner	.9	\$676.00	\$608.40
Michael Acciavetti	Partner	1.7	\$468.00	\$795.60
Michael Acciavetti	Partner	.6	\$508.00	304.80
Peggy Wedgworth	Senior Partner	.4	\$750.00	\$300.00
Peggy Wedgworth	Senior Partner	0.8	\$919.00	\$735.20
Peggy Wedgworth	Senior Partner	5	\$997.00	\$4,985.00
Renee Pothier	Paralegal	2.6	\$208.00	\$540.80
Robert Wallner	Partner	5.9	\$975.00	\$5,752.50
Robert Wallner	Partner	30.8	\$975.00	\$30,030.00
Robert Wallner	Partner	0.1	\$997.00	\$99.70
	Total:	220		\$176,971.80

B. Staffing and Tasks Performed on This Matter

7. Milberg, PLLC staffed this matter with attorneys and professionals who performed tasks based on their skills, expertise, and experience. The individuals who worked primarily on this matter and the tasks they performed are described below:

- Elizabeth McKenna and Blake Yagman: Investigated facts and materials for drafting complaint and prosecution of the case.
- Rob Wallner: Worked on Motion to Dismiss Opposition including legal research and writing on specific issues addressed by the Court.

II. HOURLY RATES

8. The historical hourly rates submitted by Milberg in this matter are the firm's usual and customary rates charged by the firm in similar matters in which the firm is paid on a contingent basis, as well as the firm's noncontingent matters.

9. Recently, Milberg's hourly rates, including the rates for specific timekeepers that worked on this matter, were approved by courts in the following cases in connection with the payment of attorneys' fees from recoveries in class action matters:

- *In re Dealer Management Systems Antitrust Litigation*, 18-cv-00864 (N.D. Ill.) (MDL No. 2687)(percentage fee awarded and cross-checked against lodestar)

III. LITIGATION EXPENSES

10. Below is an itemized list of the unreimbursed expenses Milberg incurred during the prosecution of this litigation while performing work assigned by Lead Counsel. Those expenses are reflected in the firm's books and records that are regularly maintained in the ordinary course of the firm's business and are based on the receipts and data maintained by the firm.

Category	Amount Incurred
Court Reporters / Transcripts	\$185.10
Filing Fees	\$951.00
Total:	\$ 1,136.10

11. The expenses listed above—including computer research—were incurred specifically for this case and do not include any costs for general firm overhead.

IV. WORK WITH CLASS REPRESENTATIVE

12. Milberg was attorney for Allen Neumark through February 17, 2023, one of the Class Representatives. Milberg worked with Allen Neumark in its prefiling investigation of the case, including investigation and analysis of overcharges paid as a result of Defendant's anticompetitive unlawful conduct. Following the filing of his complaint, Milberg apprised Allen Neumark of the progress and status of the litigation until February 17, 2023.

13. Milberg will not seek payment for work, lodestar, or expenses related to this litigation other than those set forth in this declaration.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on June 16, 2026 at Birmingham, Alabama.

/s/Peggy Wedgworth
Peggy Wedgworth