

EXHIBIT D

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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**
14

15 AGUSTIN CACCURI et al., on behalf of
16 themselves and all others similarly situated,

17 *Plaintiffs,*

18 v.

19 SONY INTERACTIVE ENTERTAINMENT
20 LLC,

21 *Defendant.*

Case No. 21-cv-03361-AMO

**DECLARATION OF BLAKE HUNTER
YAGMAN IN SUPPORT OF MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Honorable Araceli Martínez-Olguín

1 I, Blake Hunter Yagman hereby declare as follows:

2 1. I am the named partner at YAGMAN PLLC, and was counsel for class representative
3 Plaintiff Allen Neumark. I am admitted to the practice of law in the state of New York and the
4 District of Columbia. This Declaration is submitted in support of Class Counsel's Motion for
5 Attorneys' Fees, Expenses, and Service Awards. As the primary attorney at my former firm, Israel
6 David LLC, who was responsible for the Firm's work in this matter, I have personal knowledge of
7 the facts below and, if called upon to do so, could and would testify competently thereto. I make
8 this Declaration pursuant to 28 U.S.C. § 1746 in support of Plaintiffs' Motion for Attorneys' Fees,
9 Expenses, and Service Awards.

10 2. Israel David LLC is an experienced class action, antitrust, and complex civil litigation
11 firm. Israel David attorneys have been sole lead, co-lead, and members of the executive committee
12 or plaintiffs' steering committee on antitrust matters in various business sectors, including *In re*
13 *American Airlines/JetBlue Airways Antitrust Litigation*, 1:22-cv-07374, of which I was part of the
14 lead counsel team.

15 I. OVERVIEW

16 A. Work Performed for the Benefit of the Settlement Class

17 3. Blake Hunter Yagman participated in the prosecution of this litigation on behalf of the
18 Settlement Class. The work performed by the firm at the direction of Lead Counsel included:

- 19 • Investigation, Complaint and Initiation of Litigation: Blake Hunter Yagman,
20 while at Israel David LLC, undertook significant efforts to develop the factual
21 basis and legal claims of Plaintiffs in this case. On behalf of the Settlement Class,
22 Mr. Yagman filed a class action complaint on behalf of Plaintiff Neumark and
23 other similarly situated video game purchasers. *See, Neumark v. Sony Interactive*
24 *Entertainment LLC*, Case No. 4:21-cv-05031 (N.D. Cal. 2021).
- 25 • Discovery: Blake Hunter Yagman, while at Israel David LLC, participated in the
26 discovery process, including drafting responses to Defendant's requests for
27 production, drafting document request responses, following up with Plaintiff
28

Neumark to provide relevant documents, and correspondence with opposing counsel regarding discovery issues.

- Dispositive Motions: Blake Hunter Yagman, while at Israel David LLC, participated in the drafting of dispositive motions including an opposition to a motion to preemptively deny class certification.

B. Lodestar Summary

4. Israel David 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 Blake Hunter Yagman, Madeline Sheffield, and Israel David were drafted and reviewed by Israel David LLC 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 Israel David LLC attorneys prosecuting this litigation through December 31, 2025, is approximately **56.6 hours** with a corresponding lodestar at historical rates of **\$42,332.50**. 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 (Partner, Of Counsel, Associate, Staff Attorney, Law Clerk, Paralegal, Litigation Staff), 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
Israel David	Partner	3.3	\$1,150	\$3,795
Blake Hunter Yagman	Special Counsel	52.6	\$725	\$38,135
Madeline Sheffield	Associate	0.7	\$575	\$402.50

Timekeeper	Title	Hours	Rate (Historical)	Lodestar
	Total	56.6		\$42,332.50

II. HOURLY RATES

7. The historical hourly rates submitted by Blake Hunter Yagman 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.

8. Recently, Israel David'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.

III. WORK WITH CLASS REPRESENTATIVE ALLEN NEUMARK

9. Israel David LLC were attorneys for Allen Neumark one of the Class Representatives. Israel David LLC 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. In responding to discovery, Allen Neumark met with counsel many times to discuss the requests, searched for and produced documents from files dating back to 2020, provided information in response to interrogatories, conferred with counsel regarding game purchases and costs, prepared for a deposition, and conferred with counsel regarding settlement. Allen Neumark devoted substantial time to responding to discovery in this matter and performing his duties as a Class Representative. Following the filing of his complaint, over the course of the litigation, Israel David LLC apprised Allen Neumark of the progress and status of the litigation.

10. Israel David LLC 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 17, 2026 at Wantagh, New York.

/s/ Blake Hunter Yagman

Blake Hunter Yagman

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