EXHIBIT A

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

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

Plaintiffs,

v.

SONY INTERACTIVE ENTERTAINMENT LLC,

Defendant.

Case No. 21-cv-03361-AMO

DECLARATION OF WILLIAM H. NARWORLD IN SUPPORT OF MOTION FOR ATTORNEYS' FEES, EXPENSES, AND SERVICE AWARDS

Honorable Araceli Martínez-Olguín

I, William H. Narwold, declare as follows:

1. I am a Member at Motley Rice LLC ("Motley Rice") and I lead the securities and consumer fraud litigation teams. I am admitted to the practice of law in the States of Connecticut, New York, South Carolina, as well as the District of Columbia. This Declaration is submitted in support of Class Counsel's Motion for an Award of Attorneys' Fees, Expenses, and Service Awards. I have personal knowledge of the facts below and, if called upon to do so, could and would testify competently thereto. I make this declaration pursuant to 28 U.S.C. §1746 in support of Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards.

2. Motley Rice is an experienced class action, antitrust, and complex civil litigation firm. Previously, Motley Rice attorneys have been sole lead, co-lead, and members of the executive committee on antitrust matters in various business sectors, including: *In re Xyrem (Sodium Oxybate) Antitrust Litigation*, No. 3:20-md-02966-RS (N.D. Cal.); *In re: Juul Labs. Inc. Antitrust Litigation*, 3:20-cv-02345-WHO (N.D. Cal.); *In re Effexor Antitrust Litig.*, 3:11-cv-05479-ZNQ-JBD (D. N.J.); *In re Lipitor Antitrust Litig.* 3:12-cv-02389-ZNQ-JBD (D. N.J.); *In re Solodyn Antitrust Litig.* 1:16-cv-10238-DJC (D. Mass); *In re Zetia (Ezetimibe) Antitrust Litig.*, 18-md-02836-RBS-DEM (E.D. VA); *In re Actos Antitrust Litigation*., 1:13-cv-09244 (S.D.N.Y.).

I. OVERVIEW

A. Work Performed for the Benefit of the Settlement Class

3. Motley Rice has participated in the prosecution of this litigation on behalf of the Settlement Class. The work performed by the firm included:

- Investigation, Complaint and Initiation of Litigation: Motley Rice undertook significant efforts to develop the factual basis and legal claims of Plaintiffs in this case. Motley Rice undertook an extensive prefiling investigation, including analyzing the claims and defenses in this case as well as the anticompetitive effects of Defendant's decision to eliminate digital games at retail. Motley Rice consulted with their client, Augustin Caccuri, regarding his digital game purchases on the PlayStation Store and potential damages. Motley Rice filed a

class action complaint on behalf of Augustin Caccuri and other similarly situated video game purchasers. *Caccuri v. Sony Interactive Entertainment LLC et al.*, Case No. 3:21-cv-03361, ECF No. 1.

- Discovery: Motley Rice undertook significant discovery efforts in this case. Motley Rice attorneys worked with Agustin Caccuri in the preparation of responses to Defendants' written discovery. Motley Rice gathered, reviewed and produced Mr. Caccuri's documents in response to Defendants' document requests. Motley Rice also evaluated and analyzed Defendant's discovery responses. Motley Rice participated extensively in the review of documents produced by Defendant. Motley Rice led discovery meet and confers with Sony regarding Defendant's and Plaintiffs' Discovery; led meet and confers with third parties regarding retailer PlayStation product data; and worked alongside Plaintiffs' retained expert to ascertain damages. Motley Rice began to prepare for Mr. Caccuri's deposition and was communicating with Sony regarding deposition logistics.
- Dispositive Motions: Motley Rice attorneys took the primary role in research and drafting of case management statements, two oppositions to motion to dismiss, and the opposition to Sony's motion to deny class certification.

B. Lodestar Summary

4. Motley Rice 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 Motley Rice were drafted and reviewed by Motley Rice attorneys. Lead Counsel reviewed the time entries throughout the course of the litigation. Lead Counsel has audited my firm's daily time records to ensure accuracy and compliance. That audit confirms the time to be consistent with the exercise of billing judgment to eliminate inefficiency and duplication. 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 Motley Rice prosecuting this litigation through December 31, 2025, is 8,449.5 with a corresponding lodestar at historical rates of $4,421,820.00.

6. The following summary chart identifies the individuals who worked on this matter, their titles (Member, Associate, Contract Attorney, Law Clerk, Paralegal, Litigation Technology Staff, Legal Support Staff, Administrative Assistant), the total number of hours they worked, their historic hourly billing rates, and their total lodestar. Additional details concerning the work performed by individuals who primarily worked on this matter is set forth below.

Timekeeper	Title	Hours	Rate (Historical)	Lodestar
William Narwold	Member	6.5	$1,100.00	$7,150.00
William Narwold	Member	2.2	$1,150.00	$2,530.00
William Narwold	Member	0.6	$1,250.00	$750.00
William Narwold	Member	5.9	$1,300.00	$7,670.00
William Narwold	Member	0.6	$1,315.00	$789.00
William Narwold	Member	0.3	$1,500.00	$450.00
Michael M. Buchman	Member	107.60	$925.00	$99,530.00
Michael M. Buchman	Member	438.30	$950.00	$416,385.00
Michael M. Buchman	Member	101.80	$1,030.00	$104,854.00
Michael M. Buchman	Member	245.70	$1,080.00	$265,356.00
Michael M. Buchman	Member	469.50	$1,300.00	$610,350.00
Michael M. Buchman	Member	84.70	$1,500.00	$127,050.00
Nathaniel Blakney	Associate	1,061.80	$540.00	$573,372.00
Nathaniel Blakney	Associate	20.70	$550.00	$11,385.00
Nathaniel Blakney	Associate	64.7	$800.00	$51,760.00

Timekeeper	Title	Hours	Rate (Historical)	Lodestar
Michelle Clerkin	Associate	7.2	$650.00	$4,680.00
Michelle Clerkin	Associate	1.0	$750.00	$750.00
Kiersten Holms	Associate	242.2	$625.00	$151,375.00
Hannan Seirafi	Associate	230.4	$600.00	$138,240.00
Jacob Onile-Ere	Associate	48.1	$450.00	$21,645.00
Jacob Onile-Ere	Associate	131.4	$500.00	$65,700.00
Johnny Shaw	Associate	209.1	$450	$94,095.00
Johnny Shaw	Law Clerk	127.9	$300	$38,370.00
Johnny Shaw	Law Clerk	50.2	$450	$22,590.00
Paul Barnard	Contract Attorney	643.6	$340	$218,824.00
Carl Fuardo	Contract Attorney	1,400.2	$340	$476,068.00
Ashley Koenen	Contract Attorney	38.8	$340	$13,192.00
Gladys Morales	Contract Attorney	780.1	$340	$265,234.00
Karen Seiden	Contract Attorney	1381	$340	$469,540.00
Madison Bee	Law Clerk	25.3	$300	$7,590.00
Ridge Mazingo	Law Clerk	17.1	$450	$7,695.00
Evelyn Richards	Law Clerk	3.0	$375	$1,125.00
Evelyn Richards	Law Clerk	7.0	$400	$2,800.00
Lora McLaughlin	Paralegal	0.2	$375	$75.00
Charles Pite	Paralegal	61.3	$330.00	$20,229.00
Julia Laico	Paralegal	107.4	$300.00	$32,220.00
Katherine Weil	Paralegal	8.7	$350	$3045.00

Timekeeper	Title	Hours	Rate (Historical)	Lodestar
Jonathan Ng	Paralegal	29.4	$275	$8,085.00
Jonathan Ng	Paralegal	16.6	$300	$4,980.00
Michael Krellenstein	Paralegal	31	$216	$6,696.00
Michael Krellenstein	Paralegal	18.5	$300	$5,550.00
Rachel Kink	Litigation Technology Staff	4.8	$320	$1,536.00
Li Quinlan	Litigation Technology Staff	169.3	$300	$50,790.00
Amelia Madsen	Litigation Technology Staff	0.8	$175	$140.00
Jack Rowland	Legal Support Staff	45.2	$200	$9,040.00
Polly Andrews	Administrative Assistant	1.8	$300	$540.00
	Total	**8,449.5**		**$4,421,820.00**

C. Staffing and Tasks Performed on This Matter

7. Motley Rice 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:

- Michael M. Buchman (Member): Oversaw Motley Rice team; managed the investigation, drafting and filing of complaint; attended and participated in case management meetings; drafted, reviewed and revised pleadings; supervised defensive discovery tasks for plaintiffs and offensive discovery of SIE; drafted and argued Plaintiffs' oppositions to two Motions to Dismiss and Defendant's Motion to Deny Class Certification; led efforts to resolve this litigation at the parties' Early

Neutral Evaluation ("ENE") and later mediation and was primarily responsible for drafting and filing settlement papers.

- Nathaniel Blakney (Associate): Worked on Plaintiffs' Opposition to Defendant's Motion to Deny Class Certification; key player in defensive discovery of Plaintiff and offensive discovery of Defendant; helped oversee document review team and engaged in second level review of Defendant's documents; primary drafter of Plaintiffs' ENE Statement and Mediation Statement; participated in ENE and Mediation sessions; and helped draft, review, and revise preliminary settlement approval papers.
- Johhny Shaw (Associate/Law Clerk): Investigated the allegations and potential defenses prior to filing of the complaint; drafted initial complaint; drafted, reviewed and revised pleadings.
- Jacob Onile-Ere (Associate): Investigated the allegations and potential defenses prior to filing of the complaint; drafted initial complaint; and worked on revised pleadings.
- Hannan Seirafi (Associate): Helped with various discovery tasks related to defensive discovery of Plaintiff and offensive discovery of SIE; assisted with drafting and filing initial version of preliminary approval papers.
- Carl Fuardo (Contract Attorney): reviewed and analyzed documents produced by Defendant.
- Karen Sniden (Contract Attorney): reviewed and analyzed documents produced by Defendant.
- Gladys Morales (Contract Attorney): reviewed and analyzed documents produced by Defendant.
- Paul Barnard (Contract Attorney): reviewed and analyzed documents produced by Defendant.
- Charles Pite (Paralegal): printing documents for scheduled depositions and assisted with the drafting and filing of the preliminary approval papers.

- Julia Laico (Paralegal): took internal meeting notes and notes of meet and confers with Defendant's counsel; assisted with Plaintiffs' Opposition to the Motion to Deny Class Certification; printed and organized documents for Motley Rice attorneys.
- Li Quinlan (Litigation Staff): uploaded, maintained, and analyzed discovery productions.

II. HOURLY RATES

8. The historical hourly rates submitted by Motley Rice 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. Motley Rice's hourly rates, including rates for various 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 Xyrem (Sodium Oxybate) Antitrust Litig.*, No. 20-MD-02966-RS, 2025 WL 3006647, at *4 (N.D. Cal. Oct. 27, 2025);
- *In re Aggrenox Antitrust Litig.*, 2018 WL 10705542, at *5 (D. Conn. July 19, 2018), *aff'd*, 812 F. App'x 26 (2d Cir. 2020);
- *In re Loestrin 24 Fe Antitrust Litig.*, 2020 WL 5201275, at *5 (D.R.I. Sept. 1, 2020);
- *In re Effexor Antitrust Litig.*, 3:11-cv-05479-ZNQ-JBD (D. N.J. 2024) ECF 761 at ¶15;
- *In re Lipitor Antitrust Litig.* 3:12-cv-02389-ZNQ-JBD (D. N.J. 2024) ECF 1480 at ¶16;
- *In re Solodyn Antitrust Litig.* 1:16-cv-10238-DJC (D. Mass 2018) ECF 24 at ¶¶6-7; and
- *In re Zetia (Ezetimibe) Antitrust Litig.*, 18-md-02836-RBS-DEM (E.D. VA 2023) ECF 2169 at ¶16.

III. LITIGATION EXPENSES

10. Below is an itemized list of the unreimbursed expenses Motley Rice incurred during the prosecution of this litigation. These 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
Computer Research	$10,515.96
Court/ Deposition Transcripts	$361.78
Data Analysis	$509.54
Data Hosting Fees	$57,587.99
Experts	$338,169.36
Filing Fees/Court Costs	$1,333.40
Mediation Expenses	$7,000.00
Travel / Meals / Hotels / Transportation	$5075.14
Printing	$3,415.96
Postage / Delivery Services	$65.61
Service of Process	$620.00
Subpoenaed Documents Retrieval Expense	$48.00
Total:	$424,702.74

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 PREVIOUS NAMED PLAINTIFF AUGUSTIN CACURRI

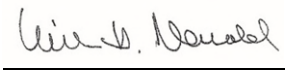
12. Motley Rice attorneys worked with Augustin Caccuri in the prefiling investigation of the case, including investigation and analysis of overcharges paid as a result of Defendant's anticompetitive conduct. Motley Rice worked with Mr. Caccuri to respond to discovery served by Defendants. Mr. Caccuri searched for and produced documents from his files, provided information in response to interrogatories, conferred with counsel regarding game purchases and costs, and prepared for a deposition. Based on Motley Rice's work with Augustin Cacurri, Mr. Caccuri devoted substantial time to responding to discovery in this matter and performing his duties as a

then named Plaintiff for the putative class. Following the filing of his complaint, over the course of the litigation, Motley Rice apprised Mr. Caccuri of the progress and status of the litigation.

13. Mr. Caccuri has fully performed all the duties and responsibilities expected of him and we respectfully submit he should be provided with a Service Award for his work performed on behalf of the Class.

14. Motley Rice 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 to the best of my knowledge. Executed on June 16, 2026 at Hartford, Connecticut.



William H. Narwold