

Gordon Ball, LLC

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Ms. Amanda Hilley

Via Email: Amanda_Hilley@scd.uscourts.gov

RE: IBFW v. Deloitte
Case No. 3:19-CV-03304-JOA

Dear Amanda,

I will attempt to provide you and the court with the history of this \$250,000 consultation fee to Lewis Cosby.

History

In 2015, I represented Lewis Cosby who was an accountant by trade in a securities class action case against KPMG in the United States District Court for the Eastern District of Tennessee. On or about early 2016, my doctors informed me that I had less than one year to live unless I received a heart transplant. While waiting on a heart transplant, I brought the Cohen Milstein firm into the KPMG case. I had the heart transplant on October 21, 2016. I returned to work in 2017 and on May 20, 2019 I received an email from Eddie Sullivan, a lawyer in Columbia, South Carolina desiring to discuss the Scana case. (Email attached hereto as Exhibit 1)

Since the Scana case concerned the building of a nuclear plant and an accounting firm, I hired Lewis Cosby as a consultant because he was both an accountant and actually had audited nuclear plants during his career.

After receiving Eddie Sullivan's initial email and our filing of the complaint in the Floyd case on November 22, 2019, I wrote Steve Toll of Cohen Milstein on July 13, 2020 describing what Lewis and I had found in researching the Scana case. (Letter attached hereto as Exhibit 2) Toll knew Lewis Cosby because again, Lewis Cosby was our client in the KPMG securities case. I wrote Toll and his firm to join us in the Scana case. Mr. Toll and his firm did not join our complaint but instead filed their own complaint on June 20, 2020 and included me as counsel on their complaint but refused to agree that we could be co-lead counsel.

Eddie Sullivan and I later found that IBEW executives were under a federal indictment and we filed a motion to recuse IBEW as class representative and Cohen Milstein as lead counsel

Thereafter, Judge Seymour in her Order of July 14, 2021 added Eddie Sullivan, Darryl Hawkins and myself to the Cohen Milstein complaint but not as co-lead counsel. On September 1, 2022, Lewis Cosby (Trico Management, LLC) sent me his bill for his consulting services. which aided me as counsel in the original Floyd case and the IBEW case. (Bill and check attached hereto as Exhibit 3) I paid him by check on September 3, 2022.

I have forwarded this bill to Steve Toll and have heard nothing about including the same as an expense for the final settlement. I spoke with Eddie Sullivan who told me that Toll and Cohen Milstein would not agree to submit Mr. Cosby's bill.

Thank you for your attention to this matter and I look forward to talking with the court.

Sincerely,

Gordon Ball

GB/dt