

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA**

INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS LOCAL 98
PENSION FUND on behalf of itself and all
others similarly situated,

Plaintiff,

vs.

DELOITTE & TOUCHE LLP;
DELOITTE LLP,

Defendants.

No. 3:19-cv-03304-JDA

**NOTICE OF FILING DECLARATION OF LAURA H. POSNER IN SUPPORT OF
(I) LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND PLAN OF ALLOCATION; AND (II) LEAD COUNSEL'S MOTION
FOR AN AWARD OF ATTORNEYS' FEES AND PAYMENT OF LITIGATION
EXPENSES**

In accordance with the Court's Preliminary Approval Order entered on November 18, 2025 (ECF No. 321), Lead Plaintiff International Brotherhood of Electrical Workers Local 98 Pension Fund ("Lead Plaintiff" or "the Fund") files this Notice of Declaration of Laura H. Posner in Support of in Support of (i) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (ii) Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses, attached as Exhibit A.

In her declaration, Ms. Posner attests that she is a partner in the law firm Cohen Milstein Sellers & Toll PLLC, which is the Court-appointed Lead Counsel for Lead Plaintiff and the Settlement Class in this Action. Ms. Posner further attests that she has personal knowledge of the matters set forth in her declaration based on her active participation in the prosecution and settlement of the Action. Her declaration sets forth the background of the Action, the nature of

the claims asserted, the procedural history, the legal services provided by Lead Counsel, and the negotiations that led to the proposed Settlement with Deloitte & Touche, LLP and Deloitte LLP (collectively, “Defendants” or “Deloitte”). And finally, she attests to why the Settlement and Plan of Allocation should be approved, and why Lead Counsel’s motion for an award of attorney’s fees and payment of expenses should be granted.

DATED: January 23, 2026

Respectfully submitted,

/s/ William Tinkler

TINKLER LAW FIRM LLC
William Tinkler (D.S.C. Bar Number 11794)
PO Box 31813
Charleston, SC 29417-1813
Tel.: (843) 853-5203
Fax.: (843) 261-5647
williamtinkler@tinklerlaw.com

Liaison Counsel for the Proposed Class

/s/ Laura H. Posner

COHEN MILSTEIN SELLERS & TOLL PLLC
Laura H. Posner
88 Pine Street, 14th Floor
New York, NY 10005
Tel.: (212) 220-2925
Fax.: (212) 838-7745
lposner@cohenmilstein.com

Steven J. Toll
Jan E. Messerschmidt
1100 New York Ave. NW, Suite 800
Washington, D.C. 20005
Tel.: (202) 408-4600
Fax.: (202) 408-4699
stoll@cohenmilstein.com
jmesserschmidt@cohenmilstein.com

Lead Counsel for Lead Plaintiff