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Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

In re MGM MIRAGE SECURITIES
 LITIGATION

This Document Relates To:

ALL ACTIONS.

) No. 2:09-cv-01558-GMN-VCF
)
) CLASS ACTION
)
) DECLARATION OF LIAISON COUNSEL,
) CURTIS B. COULTER FILED ON BEHALF
) OF LAW OFFICES OF CURTIS B.
) COULTER, P.C., IN SUPPORT OF
) APPLICATION FOR AWARD OF
) ATTORNEYS' FEES AND EXPENSES

I, Curtis B. Coulter, declare as follows:

1. I am the principal with the firm of Law Offices of Curtis B. Coulter, P.C. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the above-entitled action.

2. This firm is Liaison Counsel of record for plaintiffs.

3. The information in this declaration regarding the firm's time and expenses are set forth in the attached exhibits. I managed the day-to-day activities set forth in the litigation and I reviewed these printouts in connection with the preparation of this declaration. I believe that the time reflected in the firm's statement of time and expenses is reasonable in amount and was necessary for my interaction in this case as Liaison Counsel. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in private civil litigation.

4. The number of hours spent on this litigation by my firm is 171.05. A breakdown of the time is provided in **Exhibit A**. The hourly rate shown in **Exhibit A** are the usual and customary rates set by the firm for each individual.

5. My firm seeks an award of \$2,316.73, in expenses and costs in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in **Exhibit B**.

They include:

(a) Filing, Witness and Other Fees: \$875.00, Transportation, Hotels & Meals: \$437.26, Postage: \$111.37, and in-house copies \$893.10. These expenses have been paid to the court for filing fees set forth in **Exhibit B**.

6. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from receipts, expense vouchers, check records and other documents, and are an accurate record of the expenses.

7. My biography and representative litigation experience is attached hereto as **Exhibit**

C.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th
day of October, 2013, at Reno, Nevada.



CURTIS B. COULTER

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 3, 2015.

s/ Brian O. O'Mara

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)

Exhibit A

Exhibit A

EXHIBIT A
LODESTAR

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Curtis B. Coulter	(P)	171.05	375.00	\$64,143.75
<i>TOTAL</i>				\$64,143.75

(P) Partner

Exhibit B

Exhibit B

EXHIBIT B
EXPENSES/CHARGES

<i>CATEGORY</i>	<i>TOTAL</i>
Filing, Witness and Other Fees	\$875.00
Transportation, Hotels & Meals	\$437.26
Postage	\$111.37
Photocopies	\$893.10
<i>TOTAL</i>	<i>\$2,316.73</i>

Exhibit C

Exhibit C

Biographical Detail of Curtis B. Coulter

Prior to Law School, I earned my BS and worked as an analytical chemist for Applied Digital Data Systems (NCR Subsidiary) and for Lockheed (LEMSCO). I graduated from the University of Idaho Law School in 1987, where I was an Executive Editor of the Idaho Law Review. I served as a Judicial Law Clerk for the Honorable William N. Forman, District Judge, Second Judicial District Court, Washoe County, State of Nevada. Thereafter, from 1988 through 1990, I worked for Beckley, Singleton, Delanoy, Jaimeson, and List. I was principally retained by insurers to litigate and evaluate coverage under various policies of insurance including, commercial, and personal lines. From 1990 through 1993, I worked with Robert E. Lyle, pursuing mass tort and class actions. I have handled complex multi-party litigation including cluster actions and class litigation. I gained extensive experience representing insurance consumers and insurers in first-party insurance claims and litigation. I founded the Law Offices of Curtis B. Coulter in 1993, and I continue to handle complex litigation.

I serve on Nevada's Medical-Dental Screening Panel (8 years); State Bar of Nevada Disciplinary Panel (1996-Present); Board of Governor (formally Nevada Trial Lawyers Association) (1994 through 2010); and Nevada State Bar Committee for the Unauthorized Practice of Law and Nevada State Bar; Committee on Lawyer Advertising. I was a former Director for the Child Assault Prevention Project and past President of the Nevada Law Foundation.

I have authored numerous articles on tort and insurance litigation including: Can an Attorney recover More than \$3,000 in Fees at Mandatory Arbitration (2009); Nevada Civil Practice Manual, Chapter 20, Lexis Nexis, 2008; The Crossroads of *Res Ipsa Loquitur* and Comparative Negligence, NTLA Advocate, February 1999; Recovery for Damages Under and ERISA Policy, NTLA Advocate, April 1997; Reservation of Rights, A Contingent Denial, NTLA Advocate, April 1996; Developments in Idaho Case Law (tort and workmen's compensation) Idaho Law Review, Vol. 22, 1985-1986.

I have regularly lectured on topics related to insurance and litigation: Settling Uninsured and Underinsured Motorist Claims (2009); Effective Trial Preparation and Organization (2007); Uninsured and Underinsured Claim Handling (2006); Abusive Litigation Tactics (2003); Insurance Laws in California (2002); Ethics in Discovery (2001); Insurance and Related Ethical Issues (2000); Bad Faith Litigation (1999); Dealing with the Difficult Insurance Company (1999); Settling Insurance Claims (1997); and Settling Uninsured and Underinsured Motorist Claims (1997).

Since 1987, I have been a member in good standing with the Nevada State Bar and licensed to practice law in the State of Nevada, and the Federal District of Nevada. Since 1994, I have been a member in good standing and licensed to practice in the State of Idaho. I have received *pro hac vice* admissions to practice before numerous State and Federal courts throughout the United States.

I founded the Law Firm of Curtis B. Coulter, P.C. in 1993. The firm predominantly represents consumers in insurance related actions. My time is dedicated to complex personal injury, and multi-party litigation, cluster and class actions.

Class Actions or Putative Class Actions I have been involved in since 2010 include¹:

- a. *Garcia v. The Prudential Insurance Company of America*, Case No.: CV10-01045, Co-Lead Counsel, (Complaint filed in the Second Judicial District Court of the State of Nevada, on April 7, 2010);
- b. *McCreary v. Aetna Life Insurance Co.*, Case No.: 3:08-cv-00654, Co-Lead Counsel, (Complaint filed in United States District Court for the District of Nevada, on December 16, 2008);
- c. Admitted *pro hac vice* as Co-counsel in *Moore v. Reliance Standard Life Insurance Co.*, Case No.: 2:08-CV-00161, (Complaint filed in the United States District Court for the Northern District of Mississippi, on July 3, 2008).
- d. *Clark v. Metlife*, Case No. 3:08-CV-00158-LRH-VPC, Co-Lead Counsel, (Complaint filed in United States District Court for the District of Nevada, on August 27, 2009); and
- e. *Kiefe v. Metlife*, Case No.: 3:10-CV-00546-LRH –VPC, Co-Lead Counsel, (Complaint filed in the Second Judicial District Court of the State of Nevada, on July 29, 2010, and removed to United States District Court of the State of Nevada on September 7, 2010).

¹ This does not include actions in which I have served as Liaison Counsel.