

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT DEPARTMENT  
C.A. No. 1981CV01957

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MICH KAREN PIERRE LOUIS,  
Individually and on behalf of all others  
similarly situated,

Plaintiff,

v.

BAYADA HOME HEALTH CARE, INC.,  
DAVID BAIADA, and J. MARK BAIADA,

Defendants.

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**RECEIVED**

6/6/2022

**DECLARATION OF RICHARD B. REILING IN SUPPORT OF SETTLEMENT  
APPROVAL AND APPLICATION FOR ATTORNEYS' FEES AND EXPENSES**

I, Richard B. Reiling, declare as follows:

1. I am licensed to practice in the Commonwealth of Massachusetts, and I am counsel for Plaintiff in the above-captioned matter.

2. I have personal knowledge of the facts stated herein. If called upon to do so, I could and would competently testify thereto.

3. I submit this Declaration in support of the parties' Joint Motion for Approval of Class Action Settlement and Plaintiff's Motion for Award of Attorneys' Fees and Expenses.

4. I have substantial experience in, among other areas, wage and hour litigation on behalf of employees under both Massachusetts and federal law, employment law, complex general and commercial litigation, and litigation on behalf of consumers.

5. I have regularly litigated cases in state and federal trial and appellate courts in various jurisdictions. I have been a member of the bar of the Commonwealth of Massachusetts since 1995 and the U. S. District Court for the District of Massachusetts since 2011, and I am admitted to practice in the state of Ohio, the U.S. District Court for the Southern District of Ohio, the U.S. District Court for the Northern District of Ohio, the U.S. District Court for the Eastern District of Michigan, the United States Tax Court and the First, Second, Sixth, and Eleventh Circuit Courts of Appeal.

6. I have 27 years of experience as a practicing attorney.

7. I am well-positioned to serve as class counsel in view of my extensive experience as summarized herein.

8. The work done by me in this case has involved primarily factual investigation, client contact (conversations/conferences with the Plaintiff regarding the status of the matter and requests for and verification of information), and consulting and research regarding applicable wage and hour laws and litigation under the Massachusetts Wage Act.

9. From approximately June, 2019 through the present date, I have expended the following number of hours at the following hourly rate, in performing legal services on behalf of Plaintiff and the Class in the above-captioned matter:

<b>Attorney(s)</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Richard B. Reiling	35.8	475.00	\$17,005.00
<b>TOTALS</b>	35.8	475.00	\$17,005.00

Executed this 6<sup>th</sup> Day of June, 2022, in Boston, Massachusetts.

/s/ Richard B. Reiling  
Richard B. Reiling

**CERTIFICATE OF SERVICE**

I hereby certify, under penalty of perjury, that on June 6, 2022 I caused copies of the foregoing Declaration of Richard B. Reiling In Support of Settlement Approval and Application for Attorneys' Fees and Expenses to be served via email upon counsel for Defendants as follows:

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/s/ Richard B. Reiling \_\_\_\_\_  
Richard B. Reiling