

# EXHIBIT 7

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA**

MIKE SHAFER, DAVID KEATING, and  
WILLIAM JEFFREY IGOE, Individually  
and On Behalf of All Others Similarly  
Situated,

Plaintiffs,

v.

GLOBAL PAYMENTS INC., ACTIVE  
NETWORK LLC, JEFF SLOAN,  
CAMERON BREADY, PAUL TODD,  
JOSH WHIPPLE, and ANDREA FACINI,

Defendants.

Case No. 1:23-CV-00577-LMM

CLASS ACTION

**DECLARATION OF JONATHAN D. PARK IN SUPPORT OF CO-LEAD  
COUNSEL'S MOTION FOR ATTORNEYS' FEES AND LITIGATION  
EXPENSES ON BEHALF OF POMERANTZ LLP**

I, Jonathan D. Park, pursuant to 28 U.S.C. § 1746, hereby declare:

1. I am a member of the Bar of the State of New York. I am Of Counsel with the law firm Pomerantz LLP ("Pomerantz"), counsel to Co-Lead Plaintiff William Jeffrey Igoe, and one of the attorneys this Court appointed as Co-Lead Counsel for the proposed class in the above-captioned action (the "Action").<sup>1</sup> I submit this declaration in support of Co-Lead Counsel's motion for an award of

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<sup>1</sup> Unless otherwise defined in this Declaration, all capitalized terms have the meanings set out in the Stipulation and Agreement dated June 10, 2024 (ECF No. 65-2).

attorneys' fees in connection with services rendered in the Action, as well as for payment of Litigation Expenses incurred by my firm in connection with the Action. I have knowledge of the matters set forth herein based on personal knowledge, my review of the firm's records, and consultation with other firm personnel.

2. My firm, as Co-Lead Counsel and counsel for Co-Lead Plaintiff William Jeffrey Igoe, was involved in all aspects of prosecution and resolution of the Action, as set forth in my Declaration in Support of (I) Co-Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation, and Final Certification of Settlement Class and (II) Co-Lead Counsel's Motion for Award of Attorneys' Fees and Litigation Expenses.

3. The information in this declaration regarding the firm's time, including in the schedule attached hereto as Exhibit 1, was prepared from daily time records regularly prepared and maintained by my firm in the ordinary course of business. Time expended in preparing the application for fees and expenses has not been included in this report.

4. I believe that the time reflected in the firm's lodestar calculation is reasonable in amount and was necessary for the effective and efficient prosecution and resolution of the litigation. The total number of hours expended on this Action by my firm's attorneys and professional support staff employees from its inception through November 1, 2024 was 559.60. The total resulting lodestar for my firm is

\$415,245.00. The schedule attached hereto as Exhibit 1 is a detailed summary reflecting the amount of time spent by each attorney and professional support staff employee of my firm who was involved in this Action, and the lodestar calculation based on my firm's current hourly rates.

5. The hourly rates shown in Exhibit 1 are the current rates set by the firm for each individual. For personnel who are no longer employed by my firm, the lodestar calculation is based upon the hourly rates of such personnel in his or her final year of employment by my firm. The hourly rates are the same as, or comparable to, the rates submitted by my firm and accepted by courts for lodestar cross-checks in other securities class action litigation fee applications.

6. My firm's lodestar figures are based upon the firm's hourly rates, which do not include expense items. Expense items are recorded separately, and these amounts are not duplicated in my firm's hourly rates.

7. My firm incurred a total of \$51,067.54 in reimbursed expenses in connection with the prosecution of this Action from its inception through November 1, 2024, which are detailed in Exhibit 2 hereto.

8. The following is additional information regarding the three largest categories of expenses:

- a. **Outside Investigator Fees** (\$28,701.50). Co-Lead Counsel employed an outside investigative firm to assist in identifying and interviewing numerous

potential witnesses, including former employees of Global Payments, in connection with the preparation of the Complaint. The charges reflected are for out-of-pocket payments to the investigative firm.

b. **Expert Fees** (\$18,972.00). Co-Lead Counsel retained an expert firm to consult regarding damages and loss causation issues throughout the litigation of the Action, including in preparing the Complaint and during the settlement negotiations. Co-Lead Counsel also worked with this expert firm in developing the proposed Plan of Allocation. The charges reflected are for out-of-pocket payments to the expert firm.

c. **Online Research** (\$1,649.83). The charges reflected are for out-of-pocket payments to the vendors such as Westlaw, Lexis/Nexis, Bloomberg Law, and PACER for research done in connection with the litigation. These resources were used to obtain access to court filings and to conduct legal research and cite-checking of briefs. These expenses represent the actual expenses incurred by Pomerantz for use of these services in connection with this litigation. There are no administrative charges included in these figures. On-line research is billed to each case based on actual usage at a charge set by the vendor. When Pomerantz utilizes online services provided by a vendor with a flat-rate contract, access to the service is by a billing code entered for the specific case being litigated. At the end of each billing period, Pomerantz's costs for such

services are allocated to specific cases based on the percentage of use in connection with that specific case in the billing period.

9. The expenses in this Action are reflected in the books and records of Pomerantz, which are regularly prepared and maintained in the ordinary course of business. These records are prepared from expense vouchers, check records, and other source materials and are an accurate record of expenses incurred.

I declare that under penalty of perjury that the foregoing is true and correct.

Executed this sixth day of November, 2024, in New York, NY.

/s/ Jonathan D. Park  
Jonathan D. Park

**EXHIBIT 1***Shafer v. Global Payments Inc.*, No. 1:23-cv-00577-LMM (N.D. Ga.)**POMERANTZ LLP****TIME REPORT****Inception through November 1, 2024**

| <b>NAME</b>                         | <b>HOURS</b>  | <b>RATE</b> | <b>LODESTAR</b>     |
|-------------------------------------|---------------|-------------|---------------------|
| Jeremy Lieberman (Managing Partner) | 5.00          | \$1,325     | \$6,625.00          |
| Alex Hood (Partner)                 | 2.20          | \$975       | \$2,145.00          |
| Jonathan Park (Of Counsel)          | 464.60        | \$775       | \$360,065.00        |
| Thomas Przybylowski (Associate)     | 19.00         | \$600       | \$11,400.00         |
| Jared Rabinowitz (Associate)        | 61.40         | \$525       | \$32,235.00         |
| Simon Hall (Paralegal)              | 7.40          | \$375       | \$2,775.00          |
| <b>TOTAL LODESTAR:</b>              | <b>559.60</b> |             | <b>\$415,245.00</b> |

**EXHIBIT 2***Shafer v. Global Payments Inc.*, No. 1:23-cv-00577-LMM (N.D. Ga.)**EXPENSE REPORT****Inception through November 1, 2024**

| <b>CATEGORY</b>              | <b>AMOUNT</b>      |
|------------------------------|--------------------|
| Outside Investigator Fees    | \$28,701.50        |
| Expert Fees                  | \$18,972.00        |
| Online Research              | \$1,649.83         |
| Clerical Overtime            | \$907.57           |
| Local Travel                 | \$398.15           |
| Process Server               | \$245.00           |
| Press Releases and Newswires | \$100.00           |
| Photocopy Charges            | \$67.55            |
| Meals                        | \$25.94            |
| <b>TOTAL EXPENSES:</b>       | <b>\$51,067.54</b> |