

**Electronically Filed
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County of Santa Clara,
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Reviewed By: R. Walker
Case #2010-1-CV-180413
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1 ROBBINS GELLER RUDMAN
& DOWD LLP
2 RANDALL J. BARON (150796)
A. RICK ATWOOD, JR. (156529)
3 MAXWELL R. HUFFMAN (264687)
655 West Broadway, Suite 1900
4 San Diego, CA 92101
Telephone: 619/231-1058
5 619/231-7423 (fax)

6 Lead Counsel for Plaintiffs

7 [Additional counsel appear on signature page.]

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SANTA CLARA

10 In re McAfee, INC. SHAREHOLDER
11 LITIGATION

) Lead Case No. 1:10-cv-180413

) CLASS ACTION

12 Consolidated action, including:
Greenberg v. McAfee, Inc., Santa Clara County
13 Superior Court, Case No. 1:10-cv-180413
Colwell v. McAfee, Inc., Santa Clara County
14 Superior Court, Case No. 1:10-cv-180420
Faulkner v. McAfee, Inc., Santa Clara County
15 Superior Court, Case No. 1:10-cv-180597
16 *Korsinsky v. Bass*, Santa Clara County Superior
Court, Case No. 1:10-cv-180928

) DECLARATION OF DAN KOEPEL IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT

) DATE: October 4, 2019
TIME: 9:00 a.m.
DEPT: 5

17 _____
18 This Document Relates To:

) Judge: Hon. Thomas E. Kuhnle

19 ALL ACTIONS.
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1 I, Dan Koeppel, declare as follows:

2 1. I am Executive Director of Central Laborers' Pension Fund ("CLPF" or the "Fund"),
3 which is serving as the class representative in the above-captioned stockholder class action (the
4 "Action"). I submit this declaration in support of the settlement and proposed service award for
5 CLPF. I am over twenty-one years of age, have personal knowledge of the facts set forth in this
6 declaration, and would testimony competently thereto if called upon to do so.

7
8 2. CLPF owned common stock of McAfee, Inc. ("McAfee" or the "Company") when
9 the Agreement and Plan of Merger with Intel Corp. (the "Merger") was executed on August 19,
10 2010 and held shares in the Company through the closing of Merger on February 28, 2011.

11 3. CLPF has not received, been promised or offered, and will not accept any form of
12 compensation, directly or indirectly, for prosecuting or serving as a representative party in this
13 Action, except for: (i) such damages or other relief as the Court may award me as a member of the
14 class; (ii) such fees, costs or other payments as the Court expressly approves to be paid to me as a
15 service award; and (iii) reimbursement, paid by my attorneys, of actual and reasonable out-of-
16 pocket expenses incurred directly in connection with the prosecution of this Action.

17
18 4. CLPF does not have a business relationship with any of the defendants in this action
19 (other than as an a prior investor in McAfee), and I know of no claims or interests that CLPF has
20 which are contrary to the members of the class and McAfee's former public stockholders.

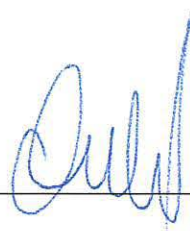
21
22 5. CLPF believes that the settlement is fair, reasonable and adequate and in the best
23 interests of the class, and CLPS therefore approved it.

24 6. CLPF moved to intervene in this Action on September 21, 2011, and the Court
25 subsequently appointed the Fund as class representative on January 17, 2012. Since joining this
26 Action, CLPF's involvement has included, *inter alia*: (i) regularly conferring with counsel
27 regarding the prosecution of the Action; (ii) reviewing pleadings, motions and appellate briefing;
28

1 (iii) searching for and/or collecting records of stock ownership and other materials related to
2 McAfee, Intel and/or the Merger as part of the discovery process; (iv) preparing for and having my
3 full-day deposition taken by defendant's counsel; and (v) discussing and considering a settlement of
4 the Action. Given that the litigation has been pending for eight years, providing a precise total for
5 the number of hours CLPF has collectively spent on the Action would be difficult. However, I am
6 reasonably confident that I personally have spent at least 25 hours on matters related to this Action.

7
8 7. I am aware that a service award of \$5,000 is being requested for CLPF in connection
9 with the time and effort that the Fund has put into this action on behalf of the class. CLPF's counsel
10 offered no assurance that the Fund would receive any compensation for bringing this Action, and
11 the prospect of the service award was not a factor in CLPF's decision to pursue this Action or
12 approve the settlement.

13 I declare under penalty of perjury that the foregoing is true and correct. Executed this 23
14 day of July, 2019 at Jacksonville, Illinois.

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19 DAN KOEPEL

DECLARATION OF SERVICE BY E-MAIL

Reviewed By: R. Walker
Case # 2010-1-CV-18043
Env # 3193055

I, JACLYN WILLIAMS, not a party to the within action, hereby declare that on July 29, 2019, I served the attached DECLARATION OF DAN KOEPEL IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT on the parties in the within action by e-mail addressed as follows:

COUNSEL FOR PLAINTIFFS:

NAME	FIRM	EMAIL
Randall J. Baron A. Rick Atwood, Jr. David T. Wissbroecker Maxwell R. Huffman	Robbins Geller Rudman & Dowd LLP	randyb@rgrdlaw.com ricka@rgrdlaw.com dwissbroecker@rgrdlaw.com mhuffman@rgrdlaw.com
Patrick J. O'Hara John T. Long	Cavanagh & O'Hara, LLP	patrick@cavanagh-ohara.com johnlong@cavanagh-ohara.com

COUNSEL FOR DEFENDANTS:

NAME	FIRM	EMAIL
Paul J. Collins	Gibson Dunn & Crutcher LLP	pcollins@gibsondunn.com
Rodney G. Strickland, Jr.	Wilson Sonsini Goodrich & Rosati, P.C.	rstrickland@wsgr.com
Robert L. Dell Angelo Maria Jhai John W. Spiegel	Munger, Tolles & Olson LLP	Robert.DellAngelo@mto.com Maria.Jhai@mto.com John.Spiegel@mto.com

Jaclyn Williams

JACLYN WILLIAMS