

DISTRICT COURT, ARAPAHOE COUNTY, COLORADO  Court Address: 7325 South Potomac St. Centennial, CO 80112		
<b>Plaintiffs:</b>  Paula Henderson, Shykira Scott, Daniel Jones, Carol Goldberg, Vahram Haroutunian, Brian Kearney, Hilda Lopez, Preference Robinson, Sharon Etchieson, Radhe Banks, Jonathan Trusty, Marie Netrosio, Michaela Mujica-Steiner, Roger Loeb, Kyle Denlinger, Martin Coleman, Alyssa Halaseh, Rachel Hunter, Todd Valentine and David Moynahan, <i>on behalf of themselves and all others similarly situated</i> ,  v.  <b>Defendants:</b>  Reventics, LLC, OMH Healthedge Holdings, Inc., d/b/a Omega Healthcare		<b>▲ COURT USE ONLY ▲</b>
<b>Attorneys for Plaintiffs:</b>  Reid Elkus (CO. BAR #32516) <b>ELKUS &amp; SISSON, P.C.</b> 7100 E Belleview Avenue, Suite 101 Greenwood Village, CO 80111 Tel: (303) 567-7981  Scott Edward Cole (CA BAR #160744) <b>COLE &amp; VAN NOTE</b> 555 12th Street, Suite 2100 Oakland, California 94607 Tel: (510) 891-9800		Case No.: 2025CV30456  Div.:
<b>DECLARATION OF JOSEPH M. LYON IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS AND SERVICE AWARDS</b>		

I, Joseph M. Lyon, hereby declare as follows:

1. I am the founder and sole principal of The Lyon Firm, a Cincinnati based law firm, that I opened in the fall of 2006. This Court preliminarily appointed me as Co-Class Counsel in this Action representing Plaintiff Joseph Linquist and the proposed Class. The contents of this Declaration are based upon my own personal knowledge.

2. I make this Declaration in Support of Plaintiffs' Motion for Attorneys' Fees, Costs and Service Awards.

3. Class Counsel's request for attorneys' fees of \$2,852,500, which is 35% of the Settlement Fund. Based on my extensive experience in complex litigation, consumer class actions, and privacy litigation throughout the country, including the District Court of Colorado, this request is well within the range of reasonableness for settlements of this nature and size as well as the substantial work and results achieved in light of the many risks highlighted in this Motion.

4. Class Counsel's requested fees are reasonable when considering the complexity and risks associated with litigating this case, the contingent nature of the representation, and the \$8,150,000 Settlement Fund achieved under the circumstances.

5. Class Counsel undertook this matter solely on a contingent basis, with no guarantee regarding the potential duration of the litigation or the ultimate recovery of fees or costs.

6. The attorneys' fees and costs that Class Counsel are submitting for the Court's consideration include time devoted to:

- a. Engaging in extensive efforts to develop strategic plans to litigate this matter;

- b. Vetting potential representative plaintiffs;
- c. Self-organizing and consolidating all cases before this Court;
- d. Extensively researching and filing the consolidated complaint;
- e. Opposing Defendants' motion to dismiss and motion to strike;
- f. Preparing an appellate brief;
- g. Serving substantial formal and informal discovery;
- h. Meeting and conferring regarding discovery disputes with defense counsel and negotiating agreements regarding discovery;
- i. Reviewing Defendants' production of documents;
- j. Coordinating with Representative Plaintiffs, providing discovery responses and collecting documents and preparing them for production;
- k. Undertaking substantial investigation of the Data Breach and the corporate structure of Defendants;
- l. Consulting with an expert regarding the Data Breach;
- m. Preparing extensive mediation briefs and attending three separate out of town mediation sessions;
- n. Negotiating the details of the Settlement Agreement and securing preliminary approval of the Settlement; and
- o. Responding to inquiries from Class Members after Class Notice was disseminated.
- p. Preparing the individual and publication notices and assisting in developing the claims process.

7. In addition to these tasks and the attendant resources already committed to them,

Class Counsel will need to devote additional time and resources to this case, including:

- a. Preparing for and attending the Final Approval hearing, including the research and drafting of the reply papers and responses to objections;
- b. Continuing to respond to myriad inquiries from Class Members;
- c. Overseeing the Settlement through final approval of distribution of the common fund;

- d. Overseeing the claims administration process, including addressing any claim review issues and ensuring the offered benefits reach Class Members; and
- e. Litigating any appeals.

8. My firm alone invested 525 hours litigating this matter instead of pursuing/investigating other potential cases.

9. Due to Settlement Class Counsel's ability to reach an early and excellent settlement for Settlement Class Members, costs and expenses for my firm total \$32,753.35. These reimbursable costs and expenses are related to: (a) filing and service fees, (b) reproduction expenses, (c) legal research, (d) postage, (e) (f) travel for mediation, and (g) mediation fees. These costs and expenses were necessary to prosecute this case and are modest in comparison to the enormous costs that likely would have been incurred if litigation had continued.

I declare, under penalty of perjury under the laws of the State of Ohio that the foregoing is true and correct.

Executed this May 28, 2025, in Cincinnati, Ohio.

/s/ Joseph M. Lyon  
Joseph M. Lyon (0076050)

**ATTACHMENT**



THE LYON FIRM  
Attorneys and Counselors at Law

Joseph M. Lyon  
jlyon@thelyonfirm.com

	5/22/2023	Filing Fee	Kevin Cox CDC attorney admission fee	\$223.00
	10/31/2023	Travel	Flight to Fort Lauderdale	\$671.39
	11/3/2023	Mediation	JAMS mediation deposit	\$5,250.00
	11/7/2023	Mediation	mediation half split with S. Cole	\$5,000.00
	11/7/2023	Travel	2/3 of transportation service fee (total 260.34)	\$173.56
	11/7/2023	Travel	Plane ticket	\$608.20
	11/8/2023	Travel	Uber	\$43.26
	11/9/2023	Travel	Uber	\$14.04
	11/9/2023	Travel	Uber	\$64.26
	11/13/2023	Travel	Uber	\$14.04
	1/4/2024	Pacer	Docket report	\$1.20
	1/8/2024	Pacer	Docket report	\$1.20
	1/8/2024	Pacer	Docket report	\$0.20
	1/8/2024	Pacer	Docket report	\$0.30
	1/8/2024	Pacer	Docket report	\$0.30
	1/12/2024	Pacer	Docket report	\$1.30
	1/12/2024	Pacer	Docket report	\$0.20
	1/29/2024	Pacer	docket report	\$1.30
	2/26/2024	Pacer	docket report	\$3.00
	10/10/2024	Filing Fee	10th Circuit filing fee	\$225.00
	12/2/2024	Mediation	Fed Arb Mediation Check	\$5,840.00
	12/6/2024	Biennial Renewal Fee	Joe's CO court renewal fee	\$60.00
	12/6/2024	Biennial Renewal Fee	Clint Watson's CO renewal fee	\$60.00
	5/11/2023	Westlaw Searches	Research on Causes of Action for Consolidated Complaint	\$297.00
	7/11/2023	Westlaw Searches	Research CO law of invasion of privacy	\$594.00
	9/18/2023	Westlaw Searches	Research Economic Loss Doctrine in CO	\$594.00
	1/12/2024	Westlaw Searches	Research unjust enrichment for MTD response	\$396.00
	1/13/2024	Westlaw Searches	Research Invasion of Privacy for MTD response	\$396.00
	1/14/2024	Westlaw Searches	Invasion of Privacy Research	\$297.00
			<b>TOTAL</b>	<b>\$32,753.35</b>