



EXHIBIT B

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

BRET KUKARD, Derivatively on
Behalf of the Symantec
Corporation Employee Stock
Purchase Plan,

Plaintiff,

v.

SYMANTEC CORPORATION,
FRANK E. DANGEARD,
GERALDINE B. LAYBOURNE,
DAVID L. MAHONEY,
ROBERT S. MILLER,
SUZANNE M. VAUTRINOT and
V. PAUL UNRUH,

Defendants.

C.A. No. N18C-07-117-VLM-CCLD

**DECLARATION OF RYAN M. ERNST
ON BEHALF OF BIELLI & KLAUDER, LLC IN FURTHER SUPPORT OF
PLAINTIFF’S MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, CERTIFICATION OF THE CLASS, AN AWARD OF
ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES, AND
A CASE CONTRIBUTION AWARD**

I, Ryan M. Ernst, declare as follows:

1. I am counsel at Bielli & Klauder, LLC, Liaison Counsel for Plaintiff Bret Kukard in the above-captioned matter. I am admitted to practice in this Court.

2. I respectfully submit this Declaration in further support of Class Counsel’s request for Plaintiff’s Motion for Final Approval of Class Action Settlement, Certification of the Class, An Award of Attorneys’ Fees and Reimbursement of Expenses, and a Case Contribution Award.

3. I have personal knowledge of the facts set forth herein and, if called upon to testify, I could and would testify competently thereto.

4. My firm seeks attorneys' fees and reimbursement of expenses for the work performed as Liaison Counsel for Plaintiff in connection with the above-captioned Action and settlement of the claims brought on behalf of the Class. My firm undertook this representation on a wholly contingent basis, with the understanding that we would receive no compensation, and our expenses would not be reimbursed, unless our efforts resulted in the recovery for the Class. None of the attorneys' fees and expenses submitted to this Court have been paid from any source nor have they been the subject of any prior request or prior award in any litigation or other proceeding.

5. My firm actively engaged in investigation and other litigation efforts for several years throughout the prosecution of the Action, including, *inter alia*: (1) researching and drafting the initial complaint in the Action; (2) researching the applicable law with respect to the claims in the Action and the potential defenses thereto; (3) engaging in discussions with Class Counsel; and (4) researching, reviewing, and drafting motion papers in support of the Settlement.

6. From the inception of the matter in 2018 through to October 15, 2024, Bielli & Klauder, LLC devoted 25.5 hours to the litigation, representing total lodestar of \$11,776.50. Bielli & Klauder, LLC's lodestar was prepared from

contemporaneous, daily time records prepared and maintained by the firm. Bielli & Klauder, LLC's hourly rates, as reflected in the chart in paragraph five below, are Bielli & Klauder, LLC's usual and customary rates. These rates are set based on market rates for attorneys of comparable skill and experience, and they have been approved by federal and state courts throughout the nation. *See* D.I. 38-3.

7. The chart below summarizes the hours, hourly rates, and lodestar of each Bielli & Klauder, LLC professional who worked on this matter:

NAME		HOURS	RATE	LODESTAR
Ryan Ernst	P	16.7	\$595	\$9,936.50
Melissa Hartlipp	A	0.8	\$300	\$240.00
Brooke Hoffmann	PL	8.0	\$200	\$1,600.00
Grand Total		25.5		\$11,776.50

Partner (P)
 Associate (A)
 Senior Paralegal (SP)
 Paralegal (PL)

8. I supervised and worked directly with the attorneys and other professional staff who billed time to this matter. I can aver that the hours reported and the work they reflect were reasonably necessary to the successful commencement, prosecution, and settlement of the Action.

9. Bielli & Klauder, LLC incurred a total of \$940.54 in unreimbursed expenses in connection with the Action and negotiating and seeking approval of the Settlement, as summarized in the chart below:

CATEGORY	TOTAL
Court and filing fees	\$725.00
Photocopying/Reproduction/Courier	\$215.54
TOTAL:	\$940.54

10. These expenses are reflected in records maintained by my firm in the ordinary course of business. These records are prepared from expense vouchers, invoices, and other records submitted contemporaneously as they are incurred. I have reviewed the expense records in detail and can aver that they were reasonably necessary for the effective and efficient prosecution and resolution of the Action, and they are reasonable in amount.

11. As set forth in Bielli & Klauder, LLC's firm résumé (D.I. 38-3), the attorneys primarily responsible for participating in the prosecution of the above captioned action are experienced and skilled advocates.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 30th day of October 2024, at Wilmington, Delaware.

/s/ Ryan M. Ernst
Ryan M. Ernst