

## **EXHIBIT 6**

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**IN THE COURT OF COMMON PLEAS OF  
PHILADELPHIA COUNTY, PENNSYLVANIA**

KEVIN STEINKE, LOUIS FANTINI,  
EMILY FANTINI, and DANIEL REYES,  
on behalf of themselves and a class of all others  
similarly situated,

Plaintiffs,

vs.

AON INVESTMENTS USA, INC., HEWITT  
ENNISKNUPP, INC., AON HEWITT  
INVESTMENT CONSULTING, INC.,  
PORTFOLIO ADVISORS LLC, HAMILTON  
LANE ADVISORS, L.L.C., and AKSIA LLC,  
JOINTLY AND SEVERALLY,

Defendants

CIVIL ACTION

JUNE TERM, 2021

No. 210601197

JURY TRIAL DEMANDED

CLASS ACTION

COMMERCE PROGRAM

**DECLARATION OF GREGORY B. HELLER**

I, GREGORY B. HELLER, declare as follows.

1. I have personal knowledge of the following matters and, if sworn as a witness, I will be competent to testify to them.

2. I am liaison counsel for the Plaintiffs in the case and have been involved in this matter from the beginning.

3. I am a member in good standing of the bars of both the Commonwealth of Pennsylvania (attorney ID number 61130) and the state of New Jersey (attorney ID number 378632021). I am admitted to practice before the United States District Court for the Eastern District of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States Supreme Court, and have been admitted to practice *pro hac vice* in other jurisdictions.

4. I have been a practicing trial attorney for 34 years. I graduated *cum laude* from the University of Michigan School of Law. I was the Managing Editor of the *Michigan Law Review* and received several awards for legal scholarship. After law school I clerked for the Hon. Anthony J. Sirica of the United States Court of Appeals for the Third Circuit. Subsequently, I worked as a litigator and trial lawyer at a series of private firms. In June 2021, when this case was first filed, I was with McLaughlin & Lauricella, P.C. That firm has ceased operations, and since 2024 I have been a partner at Feldman Shepherd Wohlgeleirnter Tanner Weinstock Dodig LLP (“Feldman Shepherd”).

5. I have considerable experience managing and guiding complex litigation.

6. I have, for years now, been directly and actively involved as counsel for the City of Philadelphia, Philadelphia District Attorney Larry Krasner, and other government plaintiffs, in litigation against the companies that made, marketed, distributed, and sold prescription opioids. *See, e.g., City of Philadelphia v. CVS Indiana, L.L.C., et al.*, Philadelphia County Court of

Common Pleas No. 210902183; *Commonwealth of Pennsylvania v. Purdue Pharma LP, et al.*, Phila Cty CCP No. 180105594; and *City of Philadelphia v. Allergan PLC, et al.*, Phila Cty CCP No. 180102718. Many of those cases have settled or otherwise resolved, but not all of them have, and there is ongoing litigation.

7. A significant part of my practice has, for decades, involved litigation and other forms of advocacy around employee benefit plan administration. I filed and successfully pursued a class action against Capital Blue Cross, seeking to compel them to provide the full continuum of addiction treatment care to adolescents enrolled in the CHIP program. *Smith, et al. v. Capital Blue Cross et al.*, No. 110502140 (Phila. Cty. C.C.P.). I filed and successfully pursued a lawsuit that sought to compel the Federal Blue Cross program to cover residential addiction treatment for the federal workforce. *Smith v. U.S. Office of Personnel Management*, 13-cv-05235 (E.D. Pa.). I have represented individuals and providers with disputes against the companies that administer employee benefit plans, when those administrators fail to comply with the applicable law. *See, e.g., Smith v. U.S. Office of Personnel Management*, 21-cv-02805 (D.D.C.); *Trinity Teen Solutions, Inc., et al. v. Blue Cross and Blue Shield of Wyoming*, Civil Case No. 30350 (Fifth Judicial District, Park County, Wyoming). I was part of a team of lawyers representing the plaintiffs in a class action that challenged Cigna's refusal to cover Applied Behavior Analysis, a type of treatment for autism spectrum disorders that is supported by a wealth of clinical evidence. *See Churchill v. Cigna*, Case 10-cv-06911 (E.D. Pa.).

7. I have also, over many years, been involved in other advocacy efforts in Harrisburg, PA and in Washington, D.C. While these projects take many forms, they usually involve the common theme of protecting workers and families, by making sure employee benefit plans, plan administrators, and insurance companies live up to their promises. My clients in this work have

included the Pennsylvania District Attorneys Association and the County Commissioners Association of Pennsylvania, and my work has, over the years, been funded by the Arnold Foundation, by the United States Department of Justice Bureau of Justic Assistance, and by provider and patient advocacy organizations.

8. I also maintain an active catastrophic personal injury practice and have had the good fortune to secure multiple significant recoveries for my clients, by way of verdict or settlement, throughout my career.

9. I have been involved in, and have made material contributions to, a number of eight- and nine-figure recoveries, and many seven-figure recoveries.

10. In the preparation of this declaration, I have carefully reviewed my billing records. My time is contemporaneously recorded on standard billing software (Clio). These records, and the time information submitted in this Declaration, accurately reflect the time that I have put in on this matter.

11. I have been involved in the instant litigation from its conception; I have played an important role in every brief, motion, and strategic decision of consequence; and I have done my best to steer the case toward trial (or other resolution) along a path that both respects and leverages the particular strengths of the Philadelphia County Court of Commons Pleas.

12. I have tried to be as efficient as possible with my time spent on this matter, and this is reflected in the number of hours recorded. My work has tended to involve tasks and aspects where use can best be made of my particular strengths and experience.

13. I have been recognized as a Pennsylvania SuperLawyer and earned an AV ranking from Martindale.com every year, over many years.

14. My hourly rate for matters of this nature for the time period from early 2021 through December 31, 2022 was \$895/hour, a rate consistent with the rate for complex litigation and class action attorneys with similar credentials and experience. I spent 247.8 hours on this matter during that time period.

15. My rate for the time period from January 1, 2023 through January 13, 2025 was \$975/hour, a rate that is likewise consistent with the rate for complex litigation and class action attorneys with similar credentials and experience. I spent 94.4 hours on the matter during that time period.

16. Thus, the total value of my lodestar time in this matter is \$313,821.00.

17. The three law firms that represent Plaintiffs in this matter agreed in 2021 about how to apportion any recoveries of fees and expenses.

18. My previous firm (McLaughlin & Lauricella, P.C.) has ceased operations, and has agreed that Feldman Shepherd will recover costs incurred by McLaughlin & Lauricella and will recover attorneys' fees in this matter, including fees corresponding to time spent while I was at McLaughlin & Lauricella. McLaughlin & Lauricella and Feldman Shepherd have an agreement between themselves that covers how recoveries of fees and expenses will be handled.

19. Feldman Shepherd and McLaughlin & Lauricella have incurred costs in the amount of \$10,949.48 in the time period from the beginning of this case up to January 13, 2025, as laid out in the following chart.

Category	Amount	Details
Travel	\$ 518.00	Amtrak
Court filing fees	\$ 2,404.43	
Graphics	\$ 217.75	Demonstrative for mediation
Courier/express services	\$ 271.49	
Investigative services	\$ 1,311.10	Investigation

Category	Amount	Details
Legal research	\$ 1,946.05	Lexis-Nexis
	\$ 12.00	PA Bureau of Corporations and Charitable Organizations
Meals	\$ 15.50	
Photocopies/scans	\$ 988.25	
Sheriff and other service fees	\$ 718.61	
Subpoenas	\$ 50.80	
Witness fees	\$ 95.00	
Court reporters	\$ 2,400.50	Golkow Litigation Services
<b>TOTAL EXPENSES</b>	<b>\$ 10,949.48</b>	

20. All Class Counsel have agreed that funds representing fees and expenses (other than the expenses to go to A.B. Data for administration fees) may be paid from the Settlement Fund by the Class Administrator, A.B. Data, to the law firm of Mantese Honigman, and that Class Counsel will apportion these amounts among themselves.

21. I verify that the statements in this document are true and correct to the best of my knowledge, information, and belief, and I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsifications to authorities.

Dated: August 22, 2025

*Gregory B. Heller*

GREGORY B. HELLER