

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

VICTORIA HALTER, individually, on behalf of
the Providence Health & Services 401(k)
Savings Plan and on Behalf of all similarly
situated participants and beneficiaries of the
Plan,

Plaintiff,

v.

PROVIDENCE HEALTH & SERVICES;
PROVIDENCE HEALTH & SERVICES TOTAL
REWARDS MANAGEMENT COMMITTEE; John
and Jane Does 1-30 in their capacities as
members of the Administrative Committee,

Defendants.

NO. 2:25-cv-00210-JNW

**SUPPLEMENTAL DECLARATION OF PAUL
J. SHARMAN IN SUPPORT OF (1)
PLAINTIFF'S MOTION FOR FINAL
APPROVAL AND (2) CLASS COUNSEL'S
MOTION FOR AN AWARD OF FEES,
COSTS, AND A SERVICE AWARD**

I, Paul Sharman, declare as follows:

1. I am lead counsel for Plaintiffs in this action.
2. I have been licensed to practice law in Georgia since 2007 and in Florida since 2018.
3. I practice in the areas of employee benefits and employment law.
4. I have specific experience in representing plaintiffs in ERISA matters across the country, including cases related to pension, 401k, disability, health insurance and employee

SUPPLEMENTAL DECLARATION OF PAUL J. SHARMAN IN
SUPPORT OF (1) PLAINTIFF'S MOTION FOR FINAL APPROVAL
AND (2) CLASS COUNSEL'S MOTION FOR AN AWARD OF FEES,
COSTS, AND A SERVICE AWARD - 1

Case No. 2:25-cv-00210-JNW

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1 stock ownership plans. I also currently represent plaintiffs in 401k litigation matters in Federal
2 Court in Washington, California, Pennsylvania, New York and Missouri.

3 5. I have settled complex ERISA 401k class action matters in Georgia, California, and
4 New York within the past three years.

5 6. I included a detailed description of my qualifications and experience in the
6 declaration I submitted in connection with Plaintiff's Motion for Preliminary Approval (Dkt. 53).
7 That declaration can be found at Dkt. 55.

8 7. Plaintiff Victoria Halter signed a representation agreement with my firm to seek
9 damages by filing suit against Providence as administrator of its 401k plan and plan fiduciaries
10 in August 2024.

11 8. On behalf of the Class, Halter filed a lawsuit on October 31, 2024 in Federal
12 District Court in Oregon.

13 9. After conferring with Defense counsel, Plaintiff agreed to transfer the case to the
14 Western District of Washington in January 2025.

15 10. Plaintiff filed an Amended Complaint in February 2025.

16 11. Defendants filed an Answer in March 2025.

17 12. In April 2025, Defendants filed a Motion for Judgment on the Pleadings.

18 13. Following an initial discovery conference, the Parties agreed to mediation with
19 Robert Meyer, which was held in October 2025.

20 14. The parties reached a settlement in November 2025.

21 15. I was able to act as lead counsel to resolve this case efficiently because of my
22 experience litigating class action cases, particularly cases involving ERISA.

23 16. Overall, I have spent 353 hours to date on this matter for a total lodestar of
24 \$335,350.

17. My hourly rate is \$950. I set my rate based on several factors, including the experience and skill that are required for the particular case and rates customarily charged in the markets where these legal services are performed.

18. I also have advanced \$19,131.66 in case expenses.

Category of Expense	Total
Pre-Litigation Investigation Expenses	\$3,800.00
Oregon Local Counsel	\$780.00
Filing Fees	\$505.00
Mediation Fees	\$11,175.00
Travel	\$2,871.66
TOTAL	\$19,131.66

19. I have attached as **Exhibit 1** to this declaration a true and correct copy of the contemporaneous time records I kept during the course of this litigation.

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

EXECUTED at Alpharetta, Georgia and DATED this 31st day of August, 2026.

By: /s/ Paul J. Sharman

Paul J. Sharman, *Admitted Pro Hac Vice*