

**Exhibit 3:
Muehlbauer Law Office, Ltd. Fee Declaration
(and Exhibit A thereto)**

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13 *Attorneys for Class Representatives John V. and JoAnn M. Ferris*

14 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

15
16 JOHN V. FERRIS and JOANN M. FERRIS,
Individually and on Behalf of All Others
17 Similarly Situated,

18 Plaintiffs,

19 v.

20 WYNN RESORTS LIMITED, et al.,

21 Defendants.

Case No. 2:18-CV-00479-CDS-BNW

CLASS ACTION

**DECLARATION OF ANDREW R.
MUEHLBAUER IN SUPPORT OF
ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION
EXPENSES**

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1 I, ANDREW R. MUEHLBAUER, declare as follows pursuant to 28 U.S.C. §1746:

2 1. I am the founding partner of the law firm of Muehlbauer Law Office, Ltd. (“MLO”),
3 Liaison Counsel for Lead Plaintiffs in the above-captioned litigation. I have overseen and actively
4 participated in the prosecution of this Action for over six years of litigation and have personal
5 knowledge of the facts asserted herein.

6 2. A copy of MLO’s firm resume is attached hereto as Exhibit “A.”

7 3. MLO has actively engaged in the prosecution of the Action as Resident Nevada
8 Local Counsel for Lead Plaintiffs. Before reaching agreement in principle to settle this Action,
9 MLO had, among other things: (i) reviewed, analyzed, and revised all documents proposed to be
10 filed and/or served by Lead Plaintiffs to ensure conformance to local rules and practice, as is the
11 firm’s obligation under LR IA 11-2, (ii) conferred with Lead Counsel to assist with motions,
12 discovery stipulations, and agreements; (iii) reviewed, offered revisions on, and localized the
13 detailed Amended Complaint; (iv) analyzed and addressed Defendants’ motion to dismiss
14 arguments and conferred with Lead Counsel on same; (v) reviewed discovery documents produced
15 by Defendants; (vi) conferred with Lead Counsel on strategic issues regarding discovery plans;
16 (vii) provided Lead Counsel with details, background, and other information on local practices,
17 local counsel, local customs, judges, magistrate judges, and other issues unique to the United States
18 District Court for the District of Nevada; (viii) prepared for and personally attended every hearing
19 over more than six years of litigation; (ix) responded to inquiries from Class Members on the status
20 of the litigation; (x) conferred with Lead Counsel on virtually every issue in the case, including
21 mediation, over more than six years of active litigation; and (xi) reviewed and responded to
22 thousands of e-mails over the six year litigation from Lead Counsel and Defendants.

23 4. The chart below summarizes the hours, rate, and lodestar of each MLO attorney
24 who worked on this matter.

25 5. The total number of hours spent on the litigation of the Action by my firm through
26 today’s date is 1,168.70. The total lodestar amount for attorney and paralegal time based on the
27 firm’s current rates is \$987,445.00. A breakdown of the lodestar is set forth in the chart below:

Total Hours and Lodestar

Name and Status	Total Hours	Rate	Total Lodestar
Andrew R. Muehlbauer (P)	1,167.20	\$850.00	\$986,170.00
Sean P. Connell (P)	1.50	\$850.00	\$1,275.00
Total			\$987,445.00

(P) – Partner; (OC) – Of Counsel; (A) – Associate; (PA) Project Associate; (PL) – Paralegal

6. MLO incurred a total of \$3,240.75 in unreimbursed expenses in connection with the prosecution of this litigation, including \$0 in anticipated litigation expenses associated with the remaining activities in this Action. These expenses are broken down as follows:

Expense Category	Amount
Filing fees	\$2,487.00
Process service and witness fees	\$731.00
Parking at United States District Court	\$22.75
Total	\$3,240.75

7. The expenses incurred are reflected in the books and records contemporaneously prepared by the firm. These books and records are prepared from expense vouchers, invoices, and other billing records, and are an accurate record of the expenses incurred. I have reviewed the expenses for which reimbursement is sought and confirmed that they were reasonably necessary for the effective and efficient prosecution and resolution of the litigation and reasonable in amount. The expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

1 8. MLO's compensation for services rendered in this case was and is entirely
 2 contingent on the success of the prosecution of the Action, and on the Court's approval of the fee
 3 and expense application. None of the attorneys' fees and expenses submitted to this Court has been
 4 paid from any source or has been the subject of any prior request or prior award in any litigation
 5 or other proceeding.

6 I declare that the foregoing is true and correct.

7 Executed on December 4, 2024.

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 10 *Andrew R. Muehlbauer*
 /s/ _____
 Andrew R. Muehlbauer

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2024, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court’s electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court’s CM/ECF System.

/s/ Murielle J. Steven Walsh
Murielle J. Steven Walsh

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Exhibit “A”

MUEHLBAUER

LAW OFFICE, LTD.

Firm History

Muehlbauer Law Office, Ltd. was formed in 2015 by Andrew R. Muehlbauer. Sean P. Connell joined the firm as a partner in 2016. The firm's sole practice is litigation, and its plaintiff litigation practice consists of representing parties in cases involving mergers and acquisition, securities fraud, consumer class actions, and general litigation matters. Muehlbauer Law Office's primary office is located in Las Vegas, Nevada, but it also maintains a presence in Arizona and Illinois to assist its clientele in litigation matters in those states.

Mr. Muehlbauer graduated *magna cum laude* from the University of Minnesota Law School in 2006 and moved to Las Vegas immediately after graduation to begin work at the regional litigation firm of Cooksey, Toolen, Gage, Duffy & Woog, PC. At Cooksey Toolen, Mr. Muehlbauer began representing shareholders in various types of litigation, including challenges to mergers, securities fraud, and derivative suits. Mr. Muehlbauer rose through the firm quickly to become the youngest partner in the firm by 2014 before leaving to create Muehlbauer Law Office. Mr. Muehlbauer has represented countless shareholders in class action lawsuits in Nevada over the past 18 years, working with top law firms in the field cooperatively to achieve favorable results for his clients.

Mr. Connell graduated from Iowa Law School with distinction in 2000 and moved to Las Vegas to begin his litigation career. Mr. Connell has represented clients in virtually every field of litigation, and has broad experience practicing before the United States District Court and in complex litigation matters.

Mr. Muehlbauer has acted as lead local counsel on numerous class action lawsuits venued in Nevada, including several of the most significant financial settlements reached in recent jurisdictional history, including but not limited to the following:

- *In re Paysign, Inc. Securities Litigation*
- *Mac Costas v. Ormat Technologies, Inc., et al.*
- *In re Yongye International, Inc. Shareholder Litigation*
- *In re Bally Technologies Inc. Stockholder Litigation*
- *In re NV Energy Inc. Shareholder Litigation*
- *In re Trunkbow International Holdings Limited Shareholder Litigation*
- *In re China Transinfo Technology Corp. Shareholder Litigation*
- *In re Winner Medical Group Shareholder Litigation*
- *In re Harbin Electric Inc. Shareholder Litigation*

Muehlbauer Law Office prides itself on its role as liaison counsel in Nevada to help guide some of the top securities litigation firms in the country through the processes and practices in the State

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of Nevada. While some liaison counsel seem to consider this role as simply acting as a local conduit for larger firms, Muehlbauer Law Office requires final review and approval of all documents to be filed in every case to ensure the quality of the work product and conformance to Nevada laws and practices. Muehlbauer Law Office also insists on being involved in every aspect of the case to ensure adherence to all legal and ethical obligations to the client, the Court, and the Nevada legal community. This collaborative approach with lead counsel has consistently yielded strong results for the client, while also ensuring that Nevada's high standards of practice and decorum are respected.