

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

In re GRAÑA Y MONTERO S.A.A.	:	Civil Action No. 2:17-cv-01105-LDH-ST
SECURITIES LITIGATION	:	
	:	CLASS ACTION
	:	
This Document Relates To:	:	
	:	
ALL ACTIONS.	:	
	:	

DECLARATION OF COREY D. HOLZER FILED ON BEHALF OF HOLZER & HOLZER,
LLC IN SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS' FEES AND
EXPENSES

I, Corey D. Holzer, declare as follows:

1. I am a member of the firm of Holzer & Holzer, LLC. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the above-entitled action.

2. My firm represents Lead Plaintiff Treasure Finance Holding Corp. ("Lead Plaintiff") and is court-appointed Lead Counsel in this action, together with Robbins Geller Rudman & Dowd, LLP.

3. The information in this declaration regarding the firm's time and expenses is taken from time and expense printouts and supporting documentation prepared and maintained by the firm in the ordinary course of business. I am the partner who oversaw and conducted the day-to-day activities in the litigation. I reviewed these printouts (and backup documentation where necessary) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment. As a result of this review and the adjustments made, I believe that the time reflected in the firm's lodestar calculation and the expenses for which payment is sought, as set forth in this declaration, are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. After the reductions referred to above, the number of hours spent on this litigation by my firm is 576.00. My firm undertook a significant factual investigation to gain a detailed understanding of Defendants' alleged undisclosed scheme to bribe numerous high-ranking public

officials to secure lucrative public-works construction projects in Peru. This entailed thoroughly analyzing a wide-range of evidentiary materials, including documents and witness testimony from ongoing investigations in Peru and Brazil, reviewing and analyzing publicly available information regarding Graña, including, but not limited to, relevant U.S. Securities and Exchange Commission (“SEC”) filings, financial reports and press releases, and media and analysts’ reports. In addition, my firm’s work and effort in this case included participating in the preparation and filing two amended complaints, the oppositions to both of Defendants’ motions to dismiss, the mediation and settlement papers, as well as communication with Lead Plaintiff throughout the litigation. A breakdown of my firm’s lodestar is provided in Exhibit A. The lodestar amount for attorney time, based on the firm’s current rates, is \$426,793.75. The hourly rates shown in Exhibit A are the usual and customary rates set by the firm for each attorney.

5. My firm seeks an award of \$1,763.89 in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in Exhibit B.

6. The following is additional information regarding certain of these expenses:

(a) Class Action Notices/Business Wire: \$252.00. This expense was necessary under the “early notice” requirements of the Private Securities Litigation Reform Act of 1995, which provides, among other things, that “[n]ot later than 20 days after the date on which the complaint is filed, the plaintiff or plaintiffs shall cause to be published, in a widely circulated national business-oriented publication or wire service, a notice advising members of the purported plaintiff class – (I) of the pendency of the action, the claims asserted therein, and the purported class period; and (II) that, not later than 60 days after the date on which the notice

is published, any member of the purported class may move the court to serve as lead plaintiff of the purported class.” See 15 U.S.C. §78u-4(a)(3)(A)(i).

(b) Transportation, Hotels & Meals: \$1,146.63. In connection with the prosecution of this case, the firm has paid for travel expenses. The date, destination and purpose of each trip is set forth in Exhibit C.

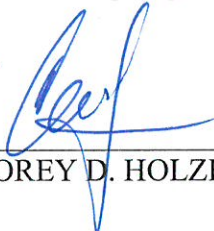
(c) Photocopies: \$249.00. In connection with this case, the firm made 996 in-house black and white copies, charging \$0.25 per copy for a total of \$249.00. The number of photocopies are entered into a log when made.

(d) Online Legal and Financial Research: \$116.26. This category includes vendors such as Westlaw. These resources were used to obtain access to SEC filings, factual databases, legal research and for cite-checking of briefs. This expense represents the expense incurred by Holzer & Holzer, LLC for use of these services in connection with this litigation. The charges for this vendor vary depending upon the type of services requested.

7. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

8. The identification and background of my firm and its partners is attached hereto as Exhibit D.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of October, 2020, at Atlanta, Georgia.



COREY D. HOLZER

EXHIBIT A

EXHIBIT A

In re Grana Y Montero S.A.A. Securities Litigation, 2:17-cv-01105-LDH-ST
 Holzer & Holzer, LLC
 Inception through 10/15/20

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Corey D. Holzer	(P)	230.75	\$875.00	\$201,906.25
Marshall P. Dees	(P)	223.00	\$745.00	\$166,135.00
Luke R. Kennedy	(A)	112.25	\$490.00	\$55,002.5
Alexandra P. Rankin		10.0	\$375.00	\$3,750.00
<i>TOTAL</i>		<i>576.00</i>		<i>\$426,793.75</i>

(P) Partner

(A) Associate

EXHIBIT B

EXHIBIT B

In re Grana Y Montero S.A.A. Securities Litigation, 2:17-cv-01105-LDH-ST
Holzer & Holzer, LLC
Inception through 10/15/20

<i>CATEGORY</i>	<i>AMOUNT</i>
Class Action Notices/Business Wire	\$252.00
Transportation, Hotels & Meals	\$1,146.63
Photocopies (996 copies at \$0.25 per page)	\$249.00
Online Legal and Financial Research	\$116.26
<i>TOTAL</i>	<i>\$1,763.89</i>

EXHIBIT C

EXHIBIT C

In re Grana Y Montero S.A.A. Securities Litigation, 2:17-cv-01105-LDH-ST
Holzer & Holzer, LLC

Transportation, Hotels & Meals: \$1,146.63

<i>NAME</i>	<i>DATE</i>	<i>DESTINATION</i>	<i>PURPOSE</i>
Corey D. Holzer	11/18/2019 – 11/20/2019	New York	Mediation

EXHIBIT D

HOLZER & HOLZER, LLC
Attorneys at Law

FIRM RÉSUMÉ

HOLZER & HOLZER, LLC is an Atlanta, Georgia complex litigation firm that dedicates its practice to the enforcement of the rights that federal and state laws afford investors, consumers, and businesses harmed by the misconduct of others. Since its inception in 2000, our firm has established an excellent reputation for innovative representation of its clients through a nationwide practice.

Our attorneys have varied and noteworthy experience prosecuting class action litigation pursuant to the Securities Act of 1933 and the Securities Exchange Act of 1934, as well as under the federal and Georgia civil Racketeering and Corrupt Organizations Acts, and we have recovered tens of millions of dollars on behalf of investors through shareholder class litigation. The firm's attorneys also have significant experience prosecuting claims in derivative litigation arising from breaches of fiduciary duties under state law.

We represent clients in dozens of cases in federal and state courts and serve in court-appointed leadership roles in many of these cases. We take great pride in our aggressive advocacy, efficiency, and professionalism in the conduct of our clients' cases. We offer our clients a personalized approach to complex litigation which, because of its size and complex nature, can be a daunting prospect to investors, consumers, and businesses. Through unyielding dedication, hard work, and creativity, we have achieved notable successes on behalf of our clients.

HOLZER & HOLZER, LLC
Attorneys at Law

Examples of Present Leadership Roles

Davis v. Yelp, Inc., et al., Case No. 18-CV-400-EMC (N.D. Cal.) (Firm is serving as court appointed Co-Lead Counsel in putative shareholder class action alleging violations of the anti-fraud provisions of the Securities Exchange Act of 1934)

Enriquez v. Nabriva Therapeutics PLC et al., Case No. 19-cv-4183-VM (S.D.N.Y) (Firm is serving as court appointed Co-Lead Counsel in putative shareholder class action alleging violations of the anti-fraud provisions of the Securities Exchange Act of 1934)

In re: Grana y Montero S.A.A. Sec. Litig., Case No. 17-cv-1105-JMA (E.D.N.Y) (Firm is serving as court appointed Co-Lead Counsel in putative shareholder class action alleging violations of the anti-fraud provisions of the Securities Exchange Act of 1934)

Luczak v. National Beverage Corp., et al., Case no. 18-cv-61631-KMM (S.D. Fl.) (Firm is serving as court appointed Co-Lead Counsel in putative shareholder class action alleging violations of the anti-fraud provisions of the Securities Exchange Act of 1934)

Paciga v. Invuity, Inc., Case No. 17-cv-1005-JSW (N.D. Cal.) (Firm is serving as court appointed Co-Lead Counsel in putative shareholder class action alleging violations of the anti-fraud provisions of the Securities Exchange Act of 1934)

Yaron v. Intersect ENT, Inc., et al., 19-cv-2647-JSW (N.D. Cal.) (Firm is serving as court appointed Co-Lead Counsel in putative shareholder class action alleging violations of the anti-fraud provisions of the Securities Exchange Act of 1934)

HOLZER & HOLZER, LLC
Attorneys at Law

Examples of Firm's Achievements

Galestan v. OneMain Holdings, Inc. et al., Case No. 17-cv-01016-VM (S.D.N.Y.) (Firm served as Co-Lead Counsel in securities fraud class action and achieved settlement creating common fund in the amount of \$9 million)

Jiangchen v. Rentech, Inc., et al., Case No. 2:17-cv-1490-GW (C.D. Cal.) (Firm served as Co-Lead Counsel in securities fraud class action and achieved settlement creating common fund in the amount of \$2.05 million)

In re The Home Depot, Inc. Shareholder Deriv. Litig., Case No. 15-CV-2999-TWT (N.D. Ga.) (Firm served as Liaison Counsel in shareholder derivative litigation arising from consumer data breach that resulted in extensive corporate governance reforms designed to improve cybersecurity practices)

Schwartz v. Urban Outfitters, Inc., et al., Case No. 13-CV-5978-LFR (E.D. Pa.) (Firm represented lead plaintiff in securities fraud class action and achieved settlement creating common fund in the amount of \$8.5)

Robinson v. Audience, Inc., (Audience, Inc., Securities Litig.) Case No. 12-cv-232227 (Cal. Sup. Ct., Santa Clara County) (Firm represented lead plaintiff in class action alleging violations of the Securities Act of 1933 and assisted in recovering \$6.05 million on behalf of investors)

In re CafePress Shareholder Litig., Case No. CIV-522744 (Cal. Sup. Ct., San Mateo County) (Firm represented lead plaintiff in class action alleging violations of the Securities Act of 1933 and assisted in recovering \$8.0 million on behalf of investors)

Alex v. McCullough, et al., (Career Education Corp. Deriv. Litig.), Case No. 12-CV-8834 (N.D. Ill.) (Firm represented investor in shareholder derivative action that resulted in recovery of \$20 million for the company and substantial corporate governance reforms)

Hutchins v. NBTY, Inc., et al. (NBTY, Inc. Securities Litig.), Case No. 10-cv-2159 (LDW) (WDW) (E.D.N.Y.) (Firm served as Co-Lead Counsel in a securities fraud class action and achieved settlement creating common fund in the amount of \$6.0 million)

HOLZER & HOLZER, LLC

Attorneys at Law

Sgalambo v. McKenzie, et al. (Canadian Superior Energy, Inc. Securities Litig.), Civil Action No. 1:09-cv-10087-SAS (S.D.N.Y.) (Firm served as Co-Lead Counsel in securities fraud class action and achieved settlement creating common fund in the amount of \$5.2 million)

In re Agria Corp. Sec. Litig., Case No. 08-cv-3536-WHP (S.D.N.Y.) (Firm represented lead plaintiff in securities fraud class action and achieved settlement creating a common fund in the amount of \$3.75 million)

Frohman v. Allen, et al. (Aaron's, Inc. Deriv. Litig.) Case No. 2014-CV-245817 (Ga. Sup. Ct., Fulton County) (Firm served as sole Lead Counsel in shareholder derivative action and achieved settlement that modified corporate governance practices in connection with hostile board proxy fight)

Miller v. Anthony, et al. (Synovus Financial Corp. Deriv. Litig.), Case No. 09-cv-1811-JOF (N.D. Ga.) (Firm served as Co-Lead Counsel in shareholder derivative action and achieved settlement creating dramatic corporate governance reforms)

Mitchell v. Gozani, et al. (Neurometrix Deriv. Litig.), Case No. 08-CV-10674-RWZ (D. Mass) (Firm served as Co-Lead Counsel in a derivative action and achieved settlement significantly enhancing the company's internal controls and corporate governance, which included the hiring of a full time Chief Financial Officer)

Brenner et al. v. Future Graphics, LLC, et al., Case No. 1:06-CV-0362-CAP (N.D. Ga.) (Firm served as Co-Lead Counsel in class action alleging RICO violations and created a common fund of \$2.65 million on behalf of Class of victims of a business opportunity scam)

Brody et al. v. Kennedy, et al. (Cox Communications, Inc. Shareholder Litig.), Case No. 2004-CV-89198 (Ga. Sup. Ct., Fulton County) (Firm served as Co-Lead Counsel and achieved an increase of \$600 million in the consideration to be paid to the company's minority shareholders in connection with proposed management-led buyout)

In re IPO Sec. Litig., Master Docket No.: 21-MC-00092 (S.D.N.Y.) (Firm served on Discovery Steering Committee for 309 separate class actions alleging underwriters manipulated prices of securities that resulted in \$586 million global settlement)

HOLZER & HOLZER, LLC
Attorneys at Law

Attorney Biographies

COREY D. HOLZER

Corey D. Holzer is a co-founder and the managing partner of the firm. Mr. Holzer graduated *cum laude* from the University of Florida with a Bachelor of Science in Journalism, where he graduated second in his class in the College of Journalism and Communications. Mr. Holzer then obtained his Doctor of Jurisprudence from Emory University School of Law, where he was selected as a finalist in Moot Court competition.

Mr. Holzer represents individuals and institutional investors in litigation alleging violations of the federal securities laws, breaches of fiduciary duties under the laws of various states, and class actions under the federal antitrust laws and state consumer protection laws. Mr. Holzer has an in-depth understanding of the rights and privileges of investors and consumers and is driven by a strong desire to provide personalized representation and counseling to victimized investors and consumers. Mr. Holzer continues to establish his reputation as a corporate watchdog and effective advocate for his clients.

Mr. Holzer is a member of the State Bar of Georgia. Mr. Holzer is admitted to practice before all Georgia State and Superior Courts, the Georgia Court of Appeals, the United States District Court for the Northern District of Georgia, and the United States Court of Appeals for the Eleventh Circuit. He has been admitted to practice in countless other federal and state courts to handle specific cases.

HOLZER & HOLZER, LLC
Attorneys at Law

MARSHALL P. DEES

Marshall P. Dees joined the firm in 2008 and became a partner in January 2016. Mr. Dees graduated *cum laude* from the University of Georgia's Terry College of Business, where he received a Bachelor of Business Administration in Management Information Systems. Mr. Dees also graduated *cum laude* from Georgia State University's College of Law where he served as a member of its Moot Court Board and Student Trial Lawyers Association and also served as a court-appointed mediator in the Fulton County Landlord-Tenant Program.

Since 2007, Mr. Dees has devoted his practice to securities class action litigation and has played an important role in recovering tens of millions of dollars for investors under the federal securities laws. Mr. Dees also represents investors seeking to enforce their rights under federal and state laws governing fiduciary duty, and he has helped design comprehensive corporate governance reforms on behalf of shareholders that have been implemented by public companies. Recently, Mr. Dees has successfully represented individuals in connection with data breaches - both corporate and private.

Mr. Dees is admitted to practice law in all Georgia State and Superior Courts, the Georgia Court of Appeals, the Supreme Court of Georgia, the United States District Courts for the Northern and Middle Districts of Georgia and the 11th Circuit Court of Appeals. Mr. Dees has appeared *pro hac vice* on behalf of investors in litigation pending in courts across the country.

HOLZER & HOLZER, LLC
Attorneys at Law

LUKE R. KENNEDY

Luke R. Kennedy joined the firm as an associate in 2019. Mr. Kennedy graduated from Samford University with a Bachelor of Arts in Biology. Mr. Kennedy also graduated *cum laude* from Notre Dame Law School where he was a member of numerous student organizations, including the Business Law Forum and the Sports, Communications, and Entertainment Law Forum. Additionally, Mr. Kennedy completed an externship with the Notre Dame Athletic Department's Compliance Office.

Mr. Kennedy now represents individuals and institutional investors in litigation alleging violations of the federal securities laws and breaches of fiduciary duties under the laws of various states. Mr. Kennedy recently helped design a comprehensive set of corporate governance reforms to be implemented by a public company and serves as one of the firm's principal liaisons with its clients. Before joining the firm, Mr. Kennedy worked for an organization dedicated to connecting low-income local inventors with experienced patent attorneys.

Mr. Kennedy is a member of the State Bars of Georgia and Florida and admitted to practice law before all Georgia State and Superior Courts and all Florida State and Circuit Courts.

HOLZER & HOLZER, LLC
Attorneys at Law

ALEXANDRIA P. RANKIN

Alexandria P. Rankin was an associate of the firm until September 2018. Ms. Rankin is a graduate of the University of Florida's Warrington College of Business, where she received a Bachelor of Science in Business Administration, with a major in Finance. Ms. Rankin is also a graduate of the University of Florida's Levin College of Law, where she received a Pro Bono Certificate for Outstanding Achievement, was the recipient of the 2015 Bill McBride Public Interest Practice Fellowship, and a member of the Law Association for Women.

Ms. Rankin interned with the U.S. Securities and Exchange Commission in Atlanta during her time in law school. While with the SEC, she worked on a variety of confidential projects, participated in strategy and planning meetings with SEC attorneys, and attended educational seminars on the current federal securities rules and regulations.

Ms. Rankin is a member of the State Bar of Georgia. She is admitted to practice before all Georgia State and Superior Courts, the Georgia Court of Appeals, the United States District Court for the Northern District of Georgia, and the Supreme Court of Georgia.

HOLZER & HOLZER, LLC
Attorneys at Law

GILBERT S. HOLZER

Now retired, Gilbert S. Holzer is co-founder of the firm. Mr. Holzer received a Bachelor of Arts degree with honors in political science and economics from Sir George Williams University (now Concordia University) in Montreal, Quebec. He then obtained his Bachelor of Civil Law from McGill University in Montreal, where he graduated second in his class. Thereafter, Mr. Holzer obtained his Bachelor of Laws from McGill University where he graduated first in his class. Mr. Holzer served on the Editorial Board of the McGill Law Journal and on its Moot Court Board, and also served as counsel to the Judicial Committee, which represented the student body of McGill University.

Upon his graduation from law school, Mr. Holzer co-founded the law firm of Salomon, Holzer & Mager in Montreal, Quebec, concentrating his practice in civil litigation. After he moved to Atlanta, Mr. Holzer practiced law with Arnall Golden & Gregory LLP. He later formed his own general practice, and ultimately co-founded this firm with his son, Corey D. Holzer.

Mr. Holzer is a former member of the Bar of the Province of Quebec and a current member of the State Bar of Georgia. He is admitted to practice before all Georgia State and Superior Courts, the Georgia Court of Appeals and the United States District Court for the Northern District of Georgia. Mr. Holzer serves as a guest lecturer in the School of Public and International Affairs at the University of Georgia.

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on October 27, 2020, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such public filing to the all counsel registered to received such notice.

s/ David A. Rosenfeld

DAVID A. ROSENFELD