UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

In re GRAÑA Y MONTERO S.A.A. SECURITIES LITIGATION	Civil Action No. 2:17-cv-01105-LDH-ST
	CLASS ACTION
This Document Relates To: ALL ACTIONS.	DECLARATION OF CURTIS V. TRINKO FILED ON BEHALF OF LAW OFFICES OF CURTIS V. TRINKO IN SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES

I, Curtis V. Trinko, declare as follows:

1. I am the Principal Attorney of the law firm entitled the Law Offices of Curtis V. Trinko. 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. This firm is Assisting Counsel of record for Plaintiffs Marcia Goldberg and Treasure Finance, as well as the Class.

3. The information in this declaration regarding the firm's accrued time and incurred expenses in this matter is taken from time and expense printouts and supporting documentation prepared and/or maintained by the firm in the ordinary course of business. I am the partner who oversaw and/or conducted the day-to-day activities in the litigation, and I reviewed these printouts (and backup documentation where necessary or appropriate) 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, I believe that the time reflected in my law firm's lodestar calculation, and the incurred 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 this litigation. In addition, I believe that the expenses reflected herein are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. After the confirmatory review by me explained above, the number of hours spent on this litigation by my firm is 80.3 hours. A breakdown of the computed lodestar is provided in Exhibit A. The lodestar amount for attorney time, based on the firm's current rates for investor-

related litigation, is $68,255.00. The hourly rates shown in Exhibit A are the usual and customary rates set by this firm for my professional services in investor-related litigation.

5. My firm seeks an award of $319.00 in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in Exhibit B. All of these expenses were incurred with regard to communications with, or documents sent to, our Client Plaintiff Marcia Goldberg. In connection with this action, this firm made 1,276 in-house photocopies, charging $0.25 per copy, for a total of $319. Each time an in-house copy machine is used, our billing system requires that a case or administrative billing code be entered, and that is how the 1276 copies were identified as being related to this action.

6. The expenses pertaining to this action 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 these expenses.

7. The identification and background of my firm and its partners is attached hereto as Exhibit C.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of October, 2020, at Port Washington, New York.

Curtis V. Trinko

CURTIS V. TRINKO

EXHIBIT A

EXHIBIT A

In re Grana Y Montero S.A.A. Securities Litigation, 2:17-cv-01105-LDH-ST
Law Offices of Curtis V. Trinko
Inception through September 30, 2020

NAME		***HOURS***	***RATE***	***LODESTAR***
Curtis V. Trinko	(P)	80.3	$850/hr	$68,255.00
TOTAL		***80.3***		$68,255.00

(P) Partner

EXHIBIT B

EXHIBIT B

In re Grana Y Montero S.A.A. Securities Litigation, 2:17-cv-01105-LDH-ST
Law Offices of Curtis V. Trinko
Inception through September 30, 2020

CATEGORY		***AMOUNT***
Photocopies		
In-House: (1276 copies at $0.25 per page)		$319.00
TOTAL		***$319.00***

EXHIBIT C

EXHIBIT C

In re Grana Y Montero S.A.A. Securities Litigation, 2:17-cv-01105-LDH-ST
Law Offices of Curtis V. Trinko

FIRM RESUME

THE LAW OFFICES OF CURTIS V. TRINKO

The **LAW OFFICES OF CURTIS V. TRINKO** is an AV-PREEMINENT rated law firm which specializes in complex commercial litigation and, particularly, litigation involving violations of federal and state securities and corporate laws, as well as claims involving officers' and directors' liability, corporate governance practices and procedures, and claims of excessive executive and advisory compensation. The firm has directly participated in the recovery of substantial settlements on behalf of defrauded shareholders injured by illegal corporate activities, or shareholders denied the appropriate valuation for their equity ownership in the wake of successful and/or attempted corporate buy-outs, takeovers and other transactions involving corporate restructurings, asset sales and/or mergers and acquisitions. Moreover, the firm's efforts have assisted in restoring many millions of dollars to corporate treasuries depleted by the illegal practices and/or breaches of fiduciary duties by their corporate officers and directors. The firm has also represented both individual and corporate defendants in numerous securities class actions, investor claim-related litigation, shareholder derivative litigation, and other commercial litigation.

In addition, the firm has pursued litigation on behalf of defrauded consumers, for violations of the federal antitrust laws and various consumer protection laws, on behalf of pension plan participants, for violations of ERISA, on behalf of mass tort victims, to remedy human rights violations, as well as on behalf of Holocaust victims, those afflicted with Gulf War Syndrome, and those harmed by the Bhopal Gas Disaster.

CURTIS V. TRINKO

For the past thirty-four years, Mr. Trinko, the principal of the firm, has personally been actively involved in securities class action and derivative litigation, as well as consumer, mass-tort, environmental, and antitrust litigation in a variety of Federal District Courts and State Courts throughout the United States. In fact, Mr. Trinko has had significant involvement in approximately 450 such complex litigations. Moreover, he has also been extensively engaged in general commercial litigation in both Federal and State Courts for the past thirty-nine years.

Curtis V. Trinko graduated from New York University School of Law in 1974, where he was both a Root-Tilden Scholar and a Research Fellow at the Center for International Studies. He received his B.A. with Honors from the University of Wisconsin-Madison in 1971. From 1974-1975, he clerked with the **Hon. Thomas R. McMillen**, a United States District Judge, then sitting in the Northern District of Illinois. In 1975, he was admitted to the Bar of the State of New York, to the Bars of the U.S. District Courts for the Southern and Eastern Districts of New York, and to the Bar of the U.S. Court of Appeals for the Second Circuit. Since then, Mr. Trinko has also been admitted to the Bars of the U.S. Courts of Appeals for the Third Circuit, Ninth Circuit, Tenth Circuit, and Eleventh Circuit, the Bars of the U.S. District Court for the Western District of New York, Northern District of California and Colorado, as well as the Bar of the United States Supreme Court. Prior to establishing his own law practice, he was a member of **Rouhana & Trinko**, a Professional Corporation. Prior thereto, Mr. Trinko was affiliated with the law firm now known as **Abbey Spanier, LLP**, and was previously a litigation associate at **Milbank, Tweed, Hadley & McCloy** in New York City.

PAST AND PRESENT LITIGATION

Recent Successes

In Re Revlon, Inc. Shareholders Litigation, Case No. 4578-VCL (Del. Ch.)

In 2013, the Trinko Firm, serving as co-lead counsel with two other firms, obtained a $9.2 million settlement for Revlon shareholders in a class action alleging that Revlon breached its fiduciary duty to shareholders by failing to disclose material information regarding the company's financial performance in connection with a securities exchange offer, thereby allowing the company to purchase its own shares at an artificially deflated price. The court also awarded attorneys' fees to the Trinko Firm and its co-lead counsel for creating the conditions that enabled two institutional holders of Revlon common shares to settle their own claims for $27.7 million.

Fogarazzo, et. al v. Lehman Bros., Morgan Stanley, and Goldman Sachs, 03-CV-5194 (SAS) (S.D.N.Y.)

The Trinko Firm obtained a $6.75 million settlement from Goldman Sachs and Morgan Stanley on behalf of owners of RSL Communications shares, who alleged that the defendant banks had intentionally issued misleading analyst reports touting RSL stock, thereby artificially inflating the company's price, in an effort to win business from RSL. The shareholders alleged that they suffered damages when share prices for RSL plummeted, despite the banks' optimistic predictions. During the pendency of this action, the Trinko Firm defeated two motions to dismiss, twice won motions for class certification, reviewed over 600,000 pages of documents, and conducted 17 depositions (15 merits and two expert witnesses). In the 2011 order approving the settlement, Judge Shira A. Scheindlin stated that "the quality of representation [provided by the Trinko Firm] is beyond reproach."

Other Noteworthy Representations

This firm has actively litigated, and has been approved as class counsel, derivative counsel, or liaison counsel in the prosecution of various securities class action suits and derivative actions, and merger and acquisition-related actions, such as: In Re Bank Of America Corp. Securities, Derivative, and Employee Retirement Income Security Act (ERISA) Litigation, Master File No. 09 MD 2058 (PKC) (S.D.N.Y.) (benefit of a program of corporate governance reforms and $20 million recovery on behalf of company); Solash v. Lionel Corp., 89 Civ. 7760 (S.D.N.Y.) (recovery of $1.4 million); In Re Amdahl Securities Litigation, Master File No. C-92-20609-JW (EAI) (N.D. Cal.) (recovery of $13 million); Landes v. Goodfriend, 3-93-CV-698 (E.D. Tenn.) (recovery of $3.2 million); In Re RasterOps Corporation Securities Litigation, C.A. No. C-92-20349-RM W (EAI) (N.D. Cal. 1992) (recovery of $6.5 million); MacDavid v. Figgie, 93 CV-001798, 94-L-08 (Ohio Ct. of Common Pleas, Lake County) (Mitrovich, J.) (recovery of $3.3 million on behalf of company, the release of Employment Agreement rights as to base pay, bonuses, incentive pay, consulting fees, restricted stock and deferred compensation by various individual defendants, the creation of committee to review board's performance and structure to ensure a majority of independent directors, and the reduction of the board's operating expenses by a minimum of $200,000); In Re Nord Resources Corporation Securities Litigation, Case No. C-3-90-380 (S.D. Ohio) (recovery of $4.75 million); Telerate, Inc. Shareholder Litigation, Civ. 1115 (Del. Ch.) (benefit of $95 million); Korf v. The Cooper Companies, Inc., 89 Civ. 5892 (MGC) (S.D.N.Y.) (recovery of $1.7 million); In Re National Health Laboratories, Securities Litigation, Master File No. Civ. No. 92-1949-H (CM) (S.D. Cal.) (recovery of $64 million); In Re T^2 Medical, Inc. Shareholder Litigation, Master File No. 1:94-CV-744-RLV (N.D. Ga.) (recovery of $7 million); Fort Howard Shareholder Litigation, No. 999 (Del. Ch.) (recovery of $13.4 million);

LILCO Shareholder Litigation, No. 84-0588 (E.D.N.Y.) (recovery of $50 million); Horstmann v. Bailey, Nos. 84-4903, 84-5001 (S.D.N.Y.) and Manning v. Cornelius, No. 88-7700 (E.D. Ky.), (a class of limited partnership investors received approximately $800,000 in settlement of an action under Section 10(b) and Rule 10b-5); Lionel Securities Litigation, No. 82 Civ. 1049 (JES) (S.D.N.Y.), (recovery of $2.8 million); Petro-Lewis Securities Litigation, Civ. Action No. 84-C-326 (D. Colo.) (recovery of $137 million); Revco Shareholder Litigation, No. 106749 (Ohio Ct. of Common Pleas) (plaintiffs' counsel credited with assisting in obtaining a price of $38.50 in cash per share for the common stock of Revco, as compared to the initial proposal of $36.00 per share); Owens Illinois Inc. Shareholder Litigation, No. 86-3955 (Ohio Ct. of Common Pleas) (takeover offer of $55 per share was increased to $60 per share, and further increased to $60.50 per share); Pandick Securities Litigation, No. 8736 (Del. Ch.) (shareholders were to receive $25.50 per share in cash for common stock, but as a direct result of the litigation instituted, received a special dividend of 11.25 cents per share, for an aggregate benefit to the shareholders of $1,105,128); In Re E.F. Hutton Banking Practices Litigation, M.D.L. 649 (S.D.N.Y.) (recovery of $2.5 million); Jackson v. Henley Manufacturing Corp., Consolidated Civil Action No. 10445 (Del. Ch.) (initial proposed tender offer of $80 per share of common stock was increased to $90 per share, resulting in a benefit to the shareholders of approximately $26 million); Grossman v. Pillsbury Company, Consolidated Civil Action No. 1023 (Del Ch.) (poison pill struck down, allowing the company to be acquired by Grand Metropolitan with substantial premium over market value paid to Pillsbury's shareholders); Weintraub v. ITT, Master File No. 84-432 (D. Del.) (recovery of $7.5 million); and Walt Disney Corp. Shareholder Derivative Action (Del. Ch.) (recovery of approximately $45 million).

The firm has also acted as class or derivative counsel in obtaining substantial benefits for the public shareholders and/or companies in the following securities class actions:

- In Re IDB Communications Group Securities Litigation, CV-94-3618 (C.D. Cal.) (recovery of $75 million);
- In Re First Executive Corporation Securities Litigation, CV-89-7135 DT (KX) (C.D. Cal. 1994) ($90 million recovery);
- In Re U.S. Bioscience Securities Litigation, Civil Action No. 92-0678 (E.D. Pa.) ($15.25 million settlement);
- In Re Bristol-Myers Squibb Company Securities Litigation, Consolidated Civil Action No. 92 CIV 4007 (JES) (S.D.N.Y.) ($19 million recovery);
- In Re Diagnostek, Inc. Securities Litigation, Master File No. CIV-92-1274 JB/WWD (D.N.M.) ($16 million recovery);
- In Re Foodmaker/Jack-In-The Box, C93-517 WD (W.D. Wash.) ($13 million recovery);
- In Re Columbia Gas System, Inc. Securities Litigation, Cons. Civil Action No. 91-357-JLL (D. Del.) ($36.5 million recovery);
- In Re Chambers Development, CV 92-0679 (W.D. Pa.) ($95 million recovery);
- In Re Prudential Limited Partnership Litigation, MDL Docket No. 1005 (S.D.N.Y.) ($110 million recovery);
- In Re Tucson Electric Power Co. Securities Litigation, Civ. 89-1274 (D. Ariz.) ($30 million recovery);
- In Re N.V. Philips Securities Litigation, No. 90 Civ. 3044 (S.D.N.Y.) ($9.25 million recovery);
- In Re Consolidated Columbia Savings and Loan Actions, Master File No. 89-6538 SVW (C.D. Cal.) ($79.5 million recovery);
- Katz v. LIN Broadcasting Corp., 90 Civ 7787 (KTD) (S.D.N.Y.) ($9 million recovery);
- In Re RJR Nabisco, Inc. Shareholder Litigation, Civ. Action No. 10389 (Del. Ch.) (benefit of approximately $55 million);
- In Re Scott Paper Securities Litigation, No. 90-6192 (E.D. Pa.) ($8 million

recovery);

- In Re Dime Savings Bank of New York, No. 89-2189 (JM) (E.D.N.Y.) ($6.8 million recovery);
- Hillel v. Chase Manhattan Bank, No. 90-6239 (S.D.N.Y.) ($17.5 million recovery);
- In Re General Development Corporation Securities Litigation, No. 90-691-Civ. (S.D. Fla.) ($10 million recovery);
- Rosengarten v. Irani, et al., Case No. BC 031286 (Cal. Superior Ct., Los Angeles County) (creation of Investment Review Committee and Policy to review company's capital commitment or guarantee which exceeds $10 million in any activity other than that related to its primary business operations);
- In Re Perseptive Biosystem, Inc. Securities Litigation, C.A. No. 94-12575-PBS (D. Mass.) (recovery of $8.25 million in cash, $5 million in common stock and $2 million in warrants);
- In Re AM International, Inc. Securities Litigation, MDL Docket No. 494 (S.D.N.Y.) ($23 million recovery);
- Consumer Power Co. Derivative Litigation, Master File No. 84-Civ-3788 (E.D. Mich.) ($33 million recovery).

This firm presently serves or has recently served as class or derivative counsel in the following securities class actions or derivative actions:

- AIG Derivative Litigation, 08-CV-5240 (S.D.N.Y.);
- American Realty Capital Properties Derivative Litigation, 14-CV-8659 (AKH) (S.D.N.Y.);
- Avon Products Derivative Litigation, 13-CV-8369 (PGG) (S.D.N.Y.);
- Bioscrip Inc. Securities Litigation, 13-CV-06922 (AJN) (S.D.N.Y.);
- CenturyLink, Inc. Securities Litigation, 13-CV-0389 (LTS) (S.D.N.Y.);
- Chesapeake Energy Derivative Litigation, 5:12-CV-505-M (W.D. Okla.);
- China-Biotics, Inc. Securities Litigation, 10-CV-7838 (PAC) (S.D.N.Y.);
- China Gerui Shareholder Litigation, 14-CV-9443 (ER)(FM) (S.D.N.Y.);

- Cliffs Natural Resources Derivative Litigation, CV 14 829499 (Ohio Ct. of Common Pleas, Cuyahoga County);
- Crestwood Midstream Partners Unitholders Litigation, 4:13-CV-01763 (S.D. Tex.);
- Doral Financial Group Securities Litigation, 3:14-CV01393-GAG (D.P.R.);
- In Re Facebook, Inc. Securities and Derivative Litigation, MDL No. 12-2389 (RWS) (S.D.N.Y.);
- Francesca's Holding Corp. Securities Litigation, 13-CV-7804 (RJS) (S.D.N.Y.);
- GrowLife Shareholder Litigation, 14-CV-6091-CAS-JEM (C.D. Cal.);
- Harmony Gold Mining Corp. Securities Litigation, 08-CV-3653-BJS-MHD (S.D.N.Y.);
- Insurance Management Solutions Group Going Private Litigation, 02-006636-CI-011 (Fla. Cir. Ct., Pinellas County, Civ. Div.);
- Intralinks Holdings Derivative Litigation, Index No. 654308/2013 (N.Y. Sup. Ct., New York County, Comm. Div.);
- KKR Financial Holdings Takeover Litigation, CGC-13-536281 (Cal. Superior Ct., San Francisco County);
- Lululemon Athletica Derivative Litigation, 13-CV-5329 (KBF) (S.D.N.Y.);
- Mellanox Technologies Securities Litigation, 13-CV-1225 (AKH) (S.D.N.Y.);
- NIVS Intellimedia Technology Group Securities Litigation, 1:11-CV-02484 (KMW) (S.D.N.Y.);
- Overseas Shipping Securities Litigation, 12-CV-7948 (SAS) (S.D.N.Y.);
- In Re Sandridge Energy Inc. Securities Litigation, No. CIV-12-1341-W (W.D. Okla.);
- Tower Group International Securities Litigation, 13-CV-7085 (LLS) (S.D.N.Y.);

- In Re Weatherford International Securities Litigation, 11-CV-1646 (LAK) (S.D.N.Y.).

This firm presently serves or recently has served as class counsel in the following merger & acquisitions / transactions litigations:

- AmReit ("AMRE") Takeover Litigation, 2014-40286 (Tex. Dist. Ct., Harris County);
- Forest Laboratories Takeover Litigation, 650579/2014 (MLS) (N.Y. Sup. Ct., New York County);
- KKR Financial Holdings Takeover Litigation, CGC-13-536281 (Cal. Superior Ct., San Francisco County);
- Sirius XM Holdings Takeover Litigation, 650141/2014 (N.Y. Sup. Ct., New York County).

This firm presently serves or recently has served as class counsel in the following consumer and product liability class actions:

- Avandia Consumer Litigation, MDL 1871 (E.D. Pa.);
- Dow Jones Online Subscription Litigation, 06 Civ. 2198 (MGC) (S.D.N.Y.);
- J.E. Robert Consumer Litigation, 05-CV-02545-KAM-RER (E.D.N.Y.);
- In Re Sony Gaming Networks and Customer Data Security Breach Litigation, 3:11-md-02258-AJB-MDD (S.D. Cal.).

This firm presently serves or recently has served as class counsel in complex litigation relating to antitrust violations in the following cases:

- In Re American Express Merchants' Litigation, Master file No. 03-CV-9592 (S.D.N.Y.);
- Green Mountain Keurig Antitrust Litigation, MDL No. 2542 (S.D.N.Y.);
- OxyContin Antitrust Litigation, MDL Docket No. 1603(SHS) (S.D.N.Y.).

This firm presently serves or recently has served as counsel in complex litigation relating to individual commercial claims, labor law claims, and/or claims involving environmental contamination, in the following cases:

- In Re Bhopal Gas Disaster Litigation, 99 Civ. 11329 (S.D.N.Y.);
- Don Pepi Deli, Inc. Labor Litigation, 14-cv-7813(RA) (S.D.N.Y.);
- New Image Construction Litigation, 11-CV-8813 (JMF)(MHD) (S.D.N.Y.).

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