

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

M.B., et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 2:17-cv-4102-NKL
	)	
Steve Corsi, et al.,	)	
	)	
Defendants.	)	

DECLARATION OF JOHN M. KILROY, JR.

I, John M. Kilroy, Jr. declare as follows:

1. I am submitting this declaration in connection with Plaintiffs' Application For An Award of Attorney's Fees and Expenses in this case.

2. I have been continuously engaged in the practice of law in Kansas City, Missouri since 1973. Throughout that time I have been a member in good standing and admitted to practice in Missouri state courts; the Eighth Circuit Court of Appeals; and in the Western District of Missouri.

3. I am a 1973 graduate of the University of Kansas Law School. From 1973 until 2009, I practiced with Shughart Thomson & Kilroy, P.C., first as an Associate, then as a shareholder and as its Managing Partner and CEO from 1998 until 2009.

4. In 2009, Shughart Thomson & Kilroy, P.C. merged with Polsinelli Shalton Flanigan & Suelthaus, P.C. to form Polsinelli Shughart, P.C. now known as Polsinelli, P.C. I served as Vice-Chairman of Polsinelli Shughart from 2009 until 2012.

5. I have been involved in many class action lawsuits during my career and in fairness hearings on reasonable rates charged by other lawyers in Kansas City and in other jurisdictions around the country.

6. In my career I have been involved in setting the rates charged by lawyers at Shughart Thomson & Kilroy, P.C. and Polsinelli Shughart, P.C. I have also been involved in submitting and reviewing fee applications in numerous lawsuits involving complex litigation and class actions, and have an understanding of the hourly rates charged by Kansas City lawyers.

7. On January 1, 2019, I retired as a shareholder of Polsinelli, P.C. I continue to office at the firm, to consult with lawyers in the firm, to engage in Bar, civic and community activities, and to be aware of hourly rates charged by Kansas City lawyers.

8. I have reviewed the Complaint and the docket sheet to better understand the issues in this case. It is apparent that the St. Louis Legal Clinic, Children's Rights, the National Center for Youth Law, and Morgan Lewis & Bockius have unique and specialized abilities to effectively handle this case.

9. I have reviewed the hourly rates submitted by all the lawyers associated with the St. Louis Legal Clinic, the National Center for Youth Law, Children's Rights and Morgan Lewis & Bockius. For their most senior lawyers, plaintiffs seek rates between \$400 and \$500 per hour; for associates and staff attorney rates between \$225 and \$375 per hour; and for paralegals \$150 per hour.

10. Prior to my retirement, in 2018, my standard hourly rate for work performed for regular clients of Polsinelli, P.C. was \$585.00 per hour. The standard hourly rate for lawyers and paralegals at Polsinelli P.C. of similar years of experience is higher than the rates sought by plaintiffs.

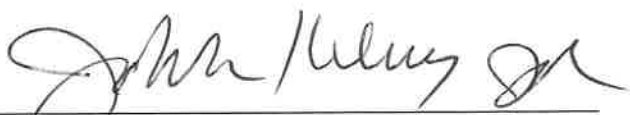
11. I believe the rates submitted by lawyers and paralegals with St. Louis Legal Clinic, the National Center for Youth Law, Children's Rights and Morgan Lewis & Bockius to be reasonable and consistent with standard rates charged by lawyers and paralegals of similar age and experience in the Kansas City area.

12. I have also reviewed specific billing entries and can see that the issues were contested by defendants. I also note that plaintiffs' fee application involves reductions for time as a matter of billing judgment, a practice that I believe is reasonable and consistent with fair billing practice.

13. I have reviewed the total time recorded, and I do not find the total to be inconsistent with my experience with the significant commitments required in complex, class action cases, or my expectation for the issues in this case.

14. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Signed this 30<sup>th</sup> day of July, 2019.

  
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JOHN M. KILROY, JR.