

EXHIBIT 3

CUETO LAW OFFICES	
Law Office of Christopher Cueto, Ltd. 7110 West Main Street Belleville, IL 62223 ccueto@cuetolaw.com 618-277-1554	Law Office of Lloyd M. Cueto 7110 West Main Street Belleville, IL 62223 cuetoim@cuetolaw.com 618-277-1554

Christopher Cueto and Lloyd M. Cueto declare under penalty of perjury that the following is true and cored and based on their personal knowledge.

1. We are over the age of eighteen years old.
2. We are solo practitioners of the firms: the Law Office of Christpher Cueto, Ltd. and the Law Office of Lloyd M. Cueto.
3. We are knowledgeable as to the amount and type of work necessary to prosecute individual and class cases on behalf of Plaintiffs and the special expertise demanded by such work in order to be successful.
4. The Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto are located in Belleville, Illinois. The firms' resumes are attached to this declaration as **Attachment A**.
5. Christopher Cueto was admitted to the bar in May 1986. The Law Office of Christopher Cueto handles mainly personal injury cases. The majority of those are class action cases and mass tort actions. It also handles individual motor vehicle accidents and medical malpractice cases.
6. Lloyd M. Cueto was admitted to the bar November 2007. The Law Office of Lloyd M. Cueto handles mainly personal injury cases. The majority of those are class action cases and mass tort actions. It also handles individual motor vehicle accidents and medical malpractice cases.
7. Lisa Brueggemann began working at my law firm as a paralegal on December 19, 2012 after working as a paralegal for 9 years at another firm. She assists in the drafts of pleadings, discovery requests and responses, letters and emails to clients, insurance companies and opposing counsel. She coordinates communications

with clients. She also orders records and organizes client files. She also efiles documents with the courts, mediation agencies, and government agencies.

8. Maria Wendler began working for the Law Office of Christopher Cueto, Ltd. on March 15, 2005. She assists in the drafts of pleadings, discovery requests and responses, letters and emails to clients, insurance companies and opposing counsel. She coordinates communications with clients. She also orders records and organizes client files. She also efiles documents with the courts and mediation agencies.
9. James E. Radcliffe was employed by the Law Office of Christopher Cueto from January 2020 until January 2026. He drafted pleadings and correspondence, attended court and mediation appearances, and communicated with clients.
10. In total, our firms' combined efforts totaled 596.2 hours litigating this case out of the total 5,807.1 hours in Class Counsel's lodestar.
11. We have reviewed the timesheets submitted to the Court and confirm that the time was kept contemporaneously and accurately in our billing system.
12. I have also reviewed the breakdown of time and narratives by category as submitted by D.G. Pantazis, and confirm those descriptions of the work our firm and Class Counsel performed, as accurate.
13. In particular, our provided work to this litigation in the following ways:
 - Communication with clients, internal team, and opposing counsel
 - Mediation, preparation and participation
 - Drafting and reviewing court filings and procedural motions
 - Settlement negotiations (travel and participation)
 - Class Representative research and vetting
 - Discovery responses and production
 - Expert witness coordination
 - Depositions coordination

14. Our firm also incurred costs that are included in the itemized list submitted as part of D.G. Pantazis' declaration. I confirm that those expenses were reasonable and necessary to prosecute this case.
15. Were my firm to bill a client hourly for the type of work performed in this case, our billing structure would be as follows: Senior Partners (15+ years) at \$1,200/hr, Junior Partners (8-14 years) at \$1,000/hr, Senior Associates (4-7 years) at \$800/hr, Junior Associates (1-3 years) at \$600/hr, Paralegals at \$250/hr.
16. Normally, our clients can only afford contingency fee contracts to pursue their claims, so we typically require a 33% to 50% contingency contract to pursue complex litigation class actions. This is similar to what was done with our clients in this case.
17. We agree that the rates submitted in our fee application are consistent with local rates afforded in this district and beyond in the 7th Circuit, and are in line with what we would normally request for this type of work. We ask that the Court apply these rates to all attorneys and their staff, appointed as Class Counsel in this case to the clients, the class, and the outcome of this case.
18. The Settlement provides real value and relief to the Class in allocation of vouchers. The litigation also changed the business practices of the Defendants in that they no longer sell mattresses with fiberglass fire barriers, and have added disclaimers to labels and their website regarding the potential effects of fiberglass in mattresses.
19. The work performed by Class Counsel was reasonable and necessary to reach this result and without the time and effort spent by Class Counsel, to the exclusion of other valuable work, the Class would not have reached this fair, reasonable, and adequate Settlement.
20. Therefore, Class Counsel's request for fees and expenses is reasonable.
21. We also know that the Class Representatives have spent time, energy, and resources in the prosecution of this case. Without their efforts, the Class would receive nothing. Their sacrifice and effort warrant the requested incentive awards.
22. Our firm, along with my co-counsel, seek fees and expenses from the Settlement Fund in the total amount of \$3,000,000.00 and for the entry of Case Contribution

awards to each of the Class Representatives as further defined in the application to the Court.

Respectfully submitted,



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ATTACHMENT A

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I. Current Mass Tort Cases Involving the Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto

(A) Local Counsel

(1) Monsanto and Cerro Flow Products, Inc. – The Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto are local counsel for approximately 10,000 persons alleging injuries caused by exposure to environmental contaminants released by Monsanto and Cerro Flow Products, Inc. These cases are pending in the 20th Judicial Circuit (State Court). A settlement with Monsanto was reached and clients were paid. A settlement agreement with Cerro Flow Products, Inc. has been reached. The terms of the settlement have been met. The settlement administration is currently engaged in subrogation/lien resolution. The average case value is determined by the individual's injury.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Attendance at Court proceedings, filing of pleadings, co-ordination of case scheduling, client communications.

Lead Counsel:

Kevin B. McKie (ARDC #6323252)
Gregory A. Cade *Admitted Pro Hac Vice*
ENVIRONMENTAL LITIGATION GROUP, P.C
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GregC@elglaw.com

Co-Lead Counsel

T. Roe Frazer II
Frazer PLC
30 Burton Hills Blvd, Suite 450

Nashville, TN 37215

Co-Local Counsel:

Paul G. Schoen, Retired
Schoen Law Firm, P.C.
120 West Main Street, Suite 212
Belleville, IL 62220

(2) Asbestos – The Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto is local counsel for approximately 224 cases pending in St. Clair County, Illinois Circuit Court. The average case value is determined by the individual's injury.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Attendance at Court proceedings, filing of pleadings, co-ordination of case scheduling, client communications.

Lead Counsel

FLINT COOPER COHN
THOMPSON & MIRACLE, LLC
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222 East Park Street, Suite 500
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(618) 288-2864: facsimile
service@flintcooper.com

(B) Referred Mass Tort Cases

(1) Talcum Powder – The Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto have 116 cases referred to other counsel. Cases are progressing. Cases are pending; no settlement offers are under consideration.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Client communications, consultation with lead counsel.

Lead Counsel

Onder Law
James Onder
110 E Lockwood Ave
St. Louis, MO 63119
(314)789-8487

(2) Truvada – The Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto has 94 cases referred to other counsel. Cases are filed in an MDL in California. Cases are pending; no settlement offers are under consideration.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Client communications, consultation with lead counsel.

Lead Counsel

Onder Law
James Onder
110 E Lockwood Ave
St. Louis, MO 63119
(314)789-8487

(3) Round Up – The Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto has 184 Round Up cases referred to other counsel. The cases have settled.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Client communications, consultation with lead counsel.

Lead Counsel

Onder Law
James Onder
110 E Lockwood Ave
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(4) In Re National Prescription Opiate Litigation – The Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto represent 3 counties with co-counsel.

Co-Counsel:

David Cates
Cates Mahoney, LLC
216 W. Pointe Drive A
Swansea, IL 62226
(618) 277-3644

Ann Callis
Tom Lech
Goldenberg Heller & Antognoli
2227 IL-157
Edwardsville, IL 62025
(618) 656-5150

Eric Holland
Holland Law Firm, LLC
211 N. Boadway, Ste 2625
St. Louis, MO 63102
(866)471-3695

(5) AFFF Litigation – The Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto represent 19 claimants.

II. Closed Mass Tort Cases

(A) Local Counsel

- (1) Depakote – 630 cases
- (2) Syngenta – 321 cases
- (3) Zyprexa – 124 cases
- (4) Avandia– 675 cases
- (5) Pradaxa – 70 cases

(6) Plavix – 715

III. Class Actions

A) Co-Counsel

(1) *Chandler, et al. v. Amazon.com, LLC, et al.*

Filed in 2020

U.S. District Court for the Illinois Southern District

Settled as a Mass Tort Action prior to Class Certification.

Settlement Administration is processing the settlement distribution.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Filing of pleadings, client communications, consultation with lead counsel.

Co-Counsel:

Kevin B. McKie (ARDC #6323252)

Gregory A. Cade *Admitted Pro Hac Vice*

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(2) *Ladas, et al. v. American Signature, Inc.*

Filed in 2020

U.S. District Court for the Illinois Southern District

Settled before class certification.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Filing of pleadings, client communications, consultation with lead counsel,
settlement negotiation.

Co-Counsel:

Kevin B. McKie (ARDC #6323252)

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(3) *Gully, et al. v. State Farm Mutual Automobile Insurance Company*
Filed in 2020
St. Clair County Illinois Circuit Court
Pending at the pleading stage.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Attendance at court proceedings, consultation with lead counsel.

Lead Counsel

Steven Giacoletto #6204424 Giacoletto Law Firm
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sgiacoletto@scglawoffice.com

(4) *Laures, et al. v. Progressive Casualty Insurance Company*
Filed in 2020
U.S. District Court for the Illinois Southern District
Pending; at the pleading stage.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Attendance at court proceedings, consultation with lead counsel.

Lead Counsel

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(5) *Nordike, et al. v. Illinois Farmers Insurance Company*
Filed in 2020
St. Clair County Illinois Circuit Court
Pending at the pleading stage.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Attendance at court proceedings, consultation with lead counsel.

Lead Counsel

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(6) *Stehman, et al. v. Country Preferred Insurance Company*
Filed in 2020
St. Clair County Illinois Circuit Court
Pending at the pleading stage.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Attendance at court proceedings, consultation with lead counsel.

Lead Counsel

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(7) *White, et al. v. Allstate Corporation*
Filed in 2020
St. Clair County Illinois Circuit Court
Pending at the pleading stage.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Attendance at court proceedings, consultation with lead counsel.

Lead Counsel

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(8) *Gutierrez v. Zinus, Inc.*

Filed in 2022

Eastern District of California

Settled as a Mass Tort Action prior to Class Certification.

Settlement Administration is processing the settlement distribution.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Filing of pleadings, client communications, consultation with lead counsel.

Co-Counsel:

Kevin B. McKie (ARDC #6323252)
Gregory A. Cade *Admitted Pro Hac Vice*
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(9) *Purchase v. FaceApp*

Filed in 2023

Southern District of Illinois

Pending in arbitration.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Attendance at court proceedings, filing of pleadings, client communications,
consultation with lead counsel.

Co Counsel

FLINT COOPER COHN

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(618) 288-2864: facsimile
service@flintcooper.com

(10) *Mesplay v. Torch Electronics, LLC*

Filed in 2026

Circuit Court in the City of St. Louis, Missouri

Pending at the pleading stage.

Law Office of Christopher Cueto, Ltd. and the Law Office of Lloyd M. Cueto's Specific Role:

Attendance at court proceedings, filing of pleadings, client communications,
communications with opposing counsel.

IV. Closed Class Action Cases

Cassin v. Illinois Bell Telephone Company

Filed in December 2006

Settled in October 2009

*Sonnenberg, et al. v. Oldford Group, Ltd.; Rational Entertainment Enterprises, Ltd.; and
Unknown Defendants*

Filed in January 2013

Dismissed

*Fahrner, et al. v. Tiltware, LLC.; Rational FT Enterprises Limited; Howard Lederer;
Jennifer Harmon-Traniello; Erik Seidel; Mike Matusow; Allen Cunningham; and
Unknown Defendants*

Filed in January 2013

Dismissed

*Flynn, et al. v. FCA US, LLC f/k/a Chrysler Group LLC and Harman International
Industries, Incorporated.*

Filed in August 2015

Dismissed