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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

JED and ALISA BEHAR, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

NORTHROP GRUMMAN CORPORATION
AND NORTHROP GRUMMAN SYSTEMS
CORPORATION,

Defendants

Case No. 21-cv-03946-HDV-SK

CLASS ACTION

**DECLARATION OF GIDEON KRACOV ON
BEHALF OF THE LAW OFFICE OF GIDEON
KRACOV IN SUPPORT OF CLASS COUNSEL'S
MOTION FOR AN AWARD OF ATTORNEYS'
FEES AND LITIGATION EXPENSES AND
CLASS REPRESENTATIVE AWARDS**

Hearing:

Date: November 12, 2026

Time: 10:00 a.m.

Place: Courtroom 5B, 5th Floor

350W. 1st Street

Los Angeles, CA 90012

Judge: Hon. Hernán D. Vera

DECLARATION OF GIDEON KRACOV

I, Gideon Kracov, hereby declare as follows:

1. I am owner of the Law Office of Gideon Kracov (**the Firm**). I submit this Declaration in support of Class Counsel's motion for attorneys' fees in connection with services rendered in the above-captioned class action (**Action**). I have personal knowledge of the matters set forth herein, and if called upon to do so, I could and would testify thereto.

2. The Firm serves as Court-appointed Class Counsel in the Action. Based in Los Angeles, the Firm has been involved in the Action from the beginning in 2020, bringing special expertise in client identification in the local Canoga Park plume area and environmental regulatory interaction with Southern California environmental and governmental regulators including the Los Angeles Regional Water Quality Control Board. The Firm assisted in all key pleadings, including the complaint, motion for class certification; opposing Defendants' motions to dismiss, motion for summary judgment, motion to decertify, motions to exclude experts under *Daubert*, and petition for appeal; worked with experts and percipient witnesses; and helped in preparation of trial motions and documents. The Firm worked extensively on tasks including fact gathering of site environmental records from local regulatory agencies; analysis of California tort and common law; analysis of Ninth Circuit environmental and toxic tort class action precedent; and settlement.

I. Class Counsel's Qualifications

3. **Gideon Kracov**. I have over 30 years of experience as a lawyer and mediator representing plaintiffs, defendants and the government in mass toxic tort, class action and environmental matters. I have owned Firm since 2004. I am admitted to practice in California courts and the United States District Court, Central District of California.

4. I previously served as a Deputy Los Angeles City Attorney in the Real Property Division where I advised the City's contaminated property redevelopment program. I also led civil prosecutions in the City Attorney's Environmental Protection Unit.

5. Prior to my public sector tenure, I practiced at Rose, Klein & Marias LLP, a prominent plaintiff's trial law firm from 1997 to 2002, handling toxic tort and personal injury cases that helped shape these areas of the law.

1 6. I started my career as a lawyer in 1995 representing Fortune 500 clients in Comprehensive
2 Environmental Response, Compensation and Liability Act (**CERCLA or Superfund**) and toxic tort
3 matters at environmental boutique firm McClintock, Weston, Benshoof, Rubalcava & MacCuish LLP
4 (now Alston & Bird). I have extensive familiarity with technical and scientific issues in property
5 contamination sites, groundwater plume fate and transport and soil vapor issues.

6 7. I graduated from the University of California Berkeley Law School as an Environmental
7 Law Certificate recipient in 1995. I am a Thomson Reuters California Super Lawyer, limited to the top 5
8 percent of lawyers.

9 8. I serve on mediation panels for the U.S. Environmental Protection Agency, the U.S.
10 District Court Central District of California, California Association of Realtors, California Department of
11 Civil Rights, Community Association Institute, Los Angeles Superior Court and Center on Conflict
12 Resolution. I have trained in dispute facilitation and mediation at the Straus Institute for Dispute
13 Resolution at Pepperdine Caruso School of Law, Udall National Center for Environmental Conflict
14 Resolution, International Association for Public Participation, and MIT Renewable Energy Clinic. Earlier
15 this year, I lectured on mediation ethics to the U.S. District Court Central District of California Mediation
16 Panel volunteers and staff.

17 9. I served in 2013 as Chair of the California Lawyers Association Environmental Law
18 Section, Executive Committee. In that role, I led educational and program activities for over 2,500 section
19 members.

20 10. As a member of the adjunct faculty at Loyola Law School, I teach land use law and dispute
21 resolution techniques to future legal professionals. Notably, I coached the Loyola Law School team to
22 first place in the 20th Annual California Lawyers Association Environmental Law Student Negotiation
23 Competition.

24 11. I currently serve as Chair of the Los Angeles County Bar Association Alternative Dispute
25 Resolution Section Executive Committee.

26 12. I have served four consecutive California Governors, including as appointee to the
27 California Air Resources Board (**CARB**), the state's lead air pollution and climate change regulatory
28 agency. I also served as the Governor's appointee to the South Coast Air Quality Management District

(SCAQMD) Governing Board which oversees air quality protection for 18 million residents in Los Angeles, Orange, Riverside and San Bernardino Counties. I also served as Chair of the California State Mining and Geology Board that regulates the reclamation of mined lands, geology, geologic and seismologic hazards, and the conservation of mineral resources.

13. Relevant to the Action, I served as Chair of the three-member Department of Toxic Substances Control (DTSC) Independent Review Panel from 2015 to 2018, overseeing governance of the DTSC on behalf of the California State Senate. The DTSC is responsible for the cleanup of contaminated properties throughout California. The Panel was created by statute (Cal. Health Safety Code section 57014) to make recommendations to the Legislature for improvements to the Department's permitting, enforcement, public outreach and fiscal management. This work resulted in extensive statutory reforms to the DTSC in 2021 (SB 158).

14. I have extensive environmental, mass tort and class action experience in the Central District of California and throughout federal and state courts including in California:

- *Los Angeles Waterkeeper v. Bell Foundry Co.* (C.D. Cal. 2:16-cv-07389-SVW-PLA) federal Clean Water Act enforcement lawsuit against a Los Angeles industrial foundry regarding industrial stormwater discharge and environmental compliance.
- 50+ industrial defendant *Orange County v. Sabic* Hazardous Substance Account Act litigation brought by water district relating to groundwater volatile organic compounds (VOCs)
- *Communities for a Better Environment v. Cenco Refining Co.*, 179 F. Supp. 2d 1128 (C.D. Cal. 2001], a landmark environmental law case in the Central District concerning federal Clean Air Act regulations and refinery operations
- Nationwide, 1 million+ member *Smith v. Keurig Green Mountain* (N.D. Cal. 4:18-cv-06690) class action settlement regarding Keurig K Cup false recyclability claims
- 100+ plaintiff *Hartwell v. California Water Co.* toxic tort damages action against 12+ industrial defendants and California Public Utility Commission regulated and non-regulated water purveyors relating to groundwater VOCs

- 1 • 25+ plaintiff public entity challenge to *City of Signal Hill vs. Los Angeles Regional Water*
2 *Board* Municipal Stormwater total maximum daily load for trash (TMDL), resulting in
3 \$150 settlement to remove trash from Los Angeles River
- 4 • *Consejo de Desarrollo Economico de Mexicali, A.C. v. United States*, 482 F.3d 1157 (9th
5 Cir. 2007), a published federal appellate case concerning complex international
6 environmental issues, the National Environmental Policy Act arising from the concrete
7 lining of the All-American Canal
- 8 • 100+ plaintiff, multi-defendant *Abarca v. Unocal* toxic tort class action relating to refinery
9 air emissions and nuisance claims in Wilmington, CA
- 10 • Nationwide *In Re: Aurora Dairy Corp. Organic Milk Marketing and Sales Practices*
11 *Litigation* MDL litigation regarding organic milk labeling involving defenses including
12 federal pre-emption

13 15. **Jordan Sisson.** Mr. Sisson was an associate at the Firm from 2019 to 2024. Mr. Sisson
14 became a California lawyer in 2019 and admitted to practice in the United States District Court Central
15 District of California. He received his J.D. from Southwestern Law School in 2016. He worked as a land
16 use and environmental attorney at the Firm. Born and raised in Los Angeles in the West San Fernando
17 Valley not far from the Canoga Park groundwater plume, Mr. Sisson served on the Land Use
18 Subcommittee of the Lake Balboa Neighborhood Council for seven years and volunteered his time with
19 community-focused organizations. He was instrumental from the inception of the Action with regard to
20 client identification and outreach in the boundaries of the Canoga Park groundwater plume.

21 **II. Class Counsel Reviewed and Audited Attorneys' Fees**

22 16. The Firm kept detailed records regarding the amount of time spent by attorneys and staff
23 working on this matter and the lodestar calculation is based on the Firm's current billing rates. The
24 information was prepared from contemporaneous, daily time records regularly prepared and maintained
25 by my firm in the ordinary course of business.

26 17. I have reviewed my Firm's detailed time records for this matter. I worked on this matter
27 from its inception and had first-hand knowledge of the work that I, and the other attorneys at my Firm
28 performed. I reviewed our billing records to audit them for accuracy. During this process, I reduced hours

1 that appeared duplicative, excessive, or unnecessary. Additionally, the lodestar included here does not
2 include time for work performed after the date of this filing.

3 **III. The Hourly Rates Sought by Class Counsel are Reasonable**

4 18. My Firm's current hourly rates for the attorneys who worked on this matter range from
5 \$863.50 for attorneys with between 0 to 10 years of experience (Jordan Sisson) and \$1,663.50 for attorneys
6 with over 20 years of experience (Gideon Kracov).

7 19. I have general familiarity with the range of hourly rates typically charged by plaintiffs'
8 class action firms in California and throughout the United States, both on a current basis and historically.
9 In determining my Firm's hourly rates from year to year, I consciously take market rates into account to
10 align our rates with the market. In this regard, my Firm's billing rates are consistent with those charged
11 by similarly experienced counsel in this District, and other Districts in California, and are commensurate
12 with those prevailing in the market for highly technical environmental litigation. I have also compared
13 these rates with the rates charged by opposing counsel for non-contingency work and these rates are below
14 those charged by opposing counsel.

15 **IV. The Number of Hours of Work Performed by Class Counsel are Reasonable**

16 20. Based on my work in the Action, as well as the review of time records reflecting work
17 performed by other attorneys in the Action, the firm prepared the following table, summarizing the work
18 that (i) identifies the names of the attorneys who worked on the Action; (ii) provides the number of hours
19 that each attorney expended in connection with work on the Action through August 12, 2026; (iii) provides
20 each timekeeper's 2026 hourly rate unless otherwise noted; and (iv) provides the lodestar of each
21 timekeeper and the entire firm.

22 21. The table above was prepared from daily time records regularly prepared and maintained
23 by my firm in the ordinary course of business, which I audited and reduced as described above. Per the
24 Court's procedure, a copy of my Firm's daily audited time records are attached hereto as Exhibit A.

25 22. The number of hours expended by the firm in the action through August 12, 2026 is
26 1,215.7. The lodestar for my firm is \$1,744,483.50.

27 23. This chart reflects my review of the time entry descriptions during our preparation of this
28 submission:

Attorney	Rate \$/hour	Hours	Lodestar
GK	1,663.50	870.1	\$1,446,057.90
JS	863.50	345.6	\$298,425.60
		1215.7	\$1,744,483.50

24. Time entries that related to more than one major litigation category were apportioned to the event or event(s) that most adequately captured the billed time.

25. To assist the Court's analysis of the time records, we prepared a chart that reflects the hours spent by each timekeeper on each of the following task categories during the course of the Action:

TASK-BASED LODESTAR REPORT INCEPTION THROUGH AUGUST 12, 2026

Description	Hours	Lodestar
Appeal	19.5	\$32,438.25
Case Management	20.4	\$38,925.90
Class Administration	124.7	\$211,068.10
Class Certification	52.5	\$87,333.75
Class Decertification	10.2	\$16,967.70
Discovery	23.3	\$34,119.55
Expert Discovery	11.8	\$19,629.30
Filings	85.4	\$124,248.25
Legal/Fact Research	248.6	\$327,250.25
Mediation	54.1	\$90,020.75
Motions to Dismiss	21.7	\$36,097.95
Motions for Summary Judgment	45.8	\$76,188.30
Non-Dispositive Motions	109.2	\$181,654.20
Other	11.3	\$18,797.55
Pre-Litigation	130.4	\$139,301.55
Settlement	55.5	\$92,324.25
Strategy	25.6	\$35,465.60
Trial	109.8	\$182,652.30
Total	1,215.7	\$1,744,483.50

26. I believe that the number of hours expended and the services performed by the attorneys at The Law Office of Gideon Kracov were reasonable and necessary for the effective and efficient prosecution and resolution of the action.

28. Executed on September 3, 2026, at Los Angeles, California.

/s/ Gideon Kracov