

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Case File No. 9:20-cv-81063-RS

STEVE HARTEL, individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

THE GEO GROUP, INC., *et al.*,

Defendants.

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**DECLARATION OF CULLIN O'BRIEN ON BEHALF OF CULLIN O'BRIEN LAW,  
P.A., IN SUPPORT OF PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS'  
FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND AWARDS TO  
PLAINTIFFS**

I, Cullin O'Brien, declare as follows:

1. I am the sole attorney at the law firm Cullin O'Brien Law, P.A.<sup>1</sup> I submit this declaration in support of Plaintiffs' application for an award of attorneys' fees in connection with services rendered in the Action, as well as for reimbursement of litigation expenses incurred in connection with the Action. I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

2. The schedule attached hereto as Exhibit A is a detailed summary indicating the amount of time spent by me from inception of the Action through and including September 29, 2023, and the lodestar calculation for me based on my current billing rates.

3. I believe that my time reflected in Exhibit A was reasonable and necessary for the effective and efficient prosecution and resolution of the Action.

4. The hourly rates for me included in Exhibit A are consistent with the rates approved by courts in other securities or shareholder litigation when conducting a lodestar cross-check.

5. The total number of hours reflected in Exhibit A is 69.75 hours. The total lodestar reflected in Exhibit A is \$45,337.50, consisting solely of my attorney time.

6. My firm's lodestar figures are based upon the firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

7. As detailed in Exhibit B, my firm is seeking reimbursement of a total of \$200 in expenses incurred in connection with the prosecution of this Action.

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<sup>1</sup> Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated May 1, 2023. ECF No. 86.

8. The litigation expenses incurred in the Action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred. The expenses reflected in Exhibit B are the expenses actually incurred by my firm.

9. Attached hereto as Exhibit C is a brief biography of my firm.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on October 3, 2023.

*s/Cullin O'Brien*

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Cullin O'Brien

**EXHIBIT A**

*Hartel v. The GEO Group, Inc., et al.,*  
Case No. 9:20-cv-81063-RS

**Cullin O'Brien Law, P.A.**

**LODESTAR REPORT  
FROM INCEPTION THROUGH SEPTEMBER 29, 2023**

<b>TIMEKEEPER/CASE</b>	<b>STATUS</b>	<b>HOURS</b>	<b>RATE</b>	<b>LODESTAR</b>
<b>ATTORNEYS:</b>				
Cullin O'Brien	Law Firm Owner	69.75	\$650/hr	\$45,337.50
<b>TOTAL LODESTAR</b>				<b>\$45,337.50</b>

**EXHIBIT B**

*Hartel v. The GEO Group, Inc., et al.,*  
**Case No. 9:20-cv-81063-RS**

**Cullin O'Brien Law, P.A.**

**EXPENSE REPORT**

**FROM INCEPTION THROUGH SEPTEMBER 29, 2023**

<b>ITEM</b>	<b>AMOUNT</b>
COURT FILING FEES	(Pro Hac Vice Filing Fee – Adam Apton) \$200
<b>GRAND TOTAL</b>	<b>\$200</b>

**EXHIBIT C**  
**Cullin O'Brien Law, P.A.**

**FIRM RESUME**

**CULLIN AVRAM O'BRIEN**  
**CULLIN O'BRIEN LAW, P.A.**

6541 NE 21<sup>st</sup> Way, Ft. Lauderdale, FL 33308

(561) 676 – 6370 (t) /561 320 – 0285 (fax); email: cullin@cullinobrienlaw.com

**EDUCATION:** **Harvard Law School**, Cambridge, MA  
J.D., 2002

**Tufts University**, Medford, MA  
B.A. *cum laude* in philosophy, 1999  
*Tufts in Chile*, coursework in philosophy at the University of Chile in Santiago, Chile during the fall of 1997

**ADMISSIONS:** **Florida Bar** 10/2002 (Bar number 0597341)  
**Ohio Bar** 12/2015 (Bar number 94055)

- Admitted to practice in the Northern and Southern District Courts of Ohio, and the Southern, Middle, and Northern Federal District Courts of Florida
- Admitted to practice in the U.S. Supreme Court, the U.S. Court of Appeals for the 11th Circuit, 9th Circuit, 8th Circuit, 6th Circuit and the 3rd Circuit

**EXEMPLARY  
CASES:**

***Montgomery v. 3300 Corp.*, No. 18-62683-CIV-COOKE (S.D. Fla.)**

- Sole trial counsel for the defendant in FLSA jury trial and achieved a full defense directed verdict on November 16, 2021

***American Marine Tech. v. M/Y Alchemist*, No. 19-60636-CIV-SINGHAL (S.D. Fla.)**

- Trial counsel in Maritime case tried to judgment on ZOOM in Summer of 2020

***American Marine Tech. v. M/Y Alchemist*, No. 21-11336, 2021 U.S. App. LEXIS 30660, at \*1 (11th Cir. Oct. 14, 2021)**

- Briefed
- Affirmed trial court judgment

***Tung v. Dycom Industries, Inc. et al.*, No.:18-81448 (S.D. Fla. Jan. 10, 2019)**

- Court-Appointed Liaison Counsel in Securities Fraud Class Action

***Stevenson et al v. P.T.G. Entertainment, Inc., et al.*, No.: 15-cv-61792 (S.D. Fla. Oct. 27, 2016)**

- Class Counsel in \$1 Million Class Settlement for Workers at Entertainment Club

***State v. Montgomery*, No. 15-010918CF10A (Broward Cnty. FL, Cir. Ct., Oct. 2016)**

- Sole defense counsel and achieved dismissal after “Stand Your Ground” self-defense evidentiary hearing

***State v. London*, No. 14-16905CF10A (Broward Cnty. FL, Cir. Ct., Apr. 2016)**

- Sole defense counsel in week-long jury trial *re* punishable-by-life felony charge

**Johnson v. General Mills, Inc.**, No.: SACV 10-00061-CJC(ANx), 2013 U.S. Dist. LEXIS 90338, at \*1 (C.D. Cal. June 17, 2013)

- \$8.5 Million Class Settlement Regarding False Advertising of Yogurt Products
- “Mr. O’Brien [is] experienced in consumer class action litigation and he is well-equipped to evaluate the settlement.” *Id.* at \*1.

**In re American Greetings Corp. Shareholder Litigation**, Lead Case No. CV 12 792421 (Ohio Ct. Common Pleas Cuyahoga, Cnty., 2013)

- \$23 Million Shareholder Settlement

**Fitzpatrick v. General Mills**, 635 F.3d 1279 (11th Cir. 2011)

- Briefed
- Approving Class Certification of False Advertising Case

**Velazquez v. City of Hialeah**, 484 F.3d 1340 (11th Cir. Fla. 2007)

- Briefed and argued
- Reversing District Court Summary Judgment Order in Police Officer Excessive Force Case

**Haney v. Miami-Dade County**, Nos. 04–20516 *et al.*, (S.D. Fla. 2005)

- \$6.25 Million Settlement Regarding Body-Search Practices in Jail

**AFFILIATIONS:**

**Cullin O’Brien Law, P.A.**, Ft. Lauderdale, FL

*12/2014 - Present*

Trial and appellate litigator in civil litigation, criminal defense and class actions.

**Robbins Geller Rudman & Dowd LLP**, Boca Raton, FL

*Partner from 1/2012 – 12/2014, Associate from 5/2008 – 12/2011*

Trial and appellate litigation attorney in direct and derivative shareholder class actions, consumer class actions, and securities fraud class actions.

**Office of the Public Defender for the 17<sup>th</sup> Judicial Circuit of Florida**

*Assistant Public Defender, 7/2006 - 5/2008*

Felony trial and appellate attorney. Handle all aspects of jury trial litigation on behalf of hundreds of criminal defendants.

**Florida Legal Services, Inc.**, Miami, FL

*Staff Attorney, 3/2006 - 7/2006*

*Pro bono* litigator on behalf of indigent persons.

**Florida Justice Institute, Inc./Volunteer Lawyers Project for the Southern District Court of Florida**, Miami, FL

*Staff Attorney, 3/2004 - 3/2006*

*Pro bono* litigator in housing discrimination, prisoner rights, and other civil rights cases.

**Shook, Hardy & Bacon LLP**, Miami, FL

*Associate, 9/2002 - 2/2004*

Member of the Tobacco Division, exclusively with Philip Morris and Lorillard Tobacco.