

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARIA TAPIA-RENDON, individually and  
on behalf of all others similarly situated,

*Plaintiff,*

v.

WORKEASY SOFTWARE, LLC

*Defendants.*

Case No. 1:21-cv-3400

Judge: Hon. Matthew F. Kennelly

Magistrate: Hon. Beth W. Jantz

**DECLARATION OF THOMAS R. KAYES  
IN SUPPORT OF MOTION FOR  
ATTORNEYS' FEES, EXPENSES, AND INCENTIVE AWARD**

Pursuant to 28 U.S.C. § 1746, I, Thomas R. Kayes, hereby declare and state as follows:

1. I am an attorney admitted to practice in the State of Illinois. I am of counsel at Loevy + Loevy, and have been retained by Plaintiff and appointed as Class Counsel in this matter.

2. I make this Declaration in support of Plaintiff's Motion for Attorneys' Fees, Expenses, and Incentive Award. I am over 18 and am fully competent to make this declaration. This declaration is based upon my personal knowledge, except where expressly noted otherwise.

***Background and Experience***

3. I graduated magna cum laude and order of the coif from the Northwestern University Pritzker School of Law in 2013.

4. After graduation, I worked on complex litigation as a law clerk for Judge Richard C. Tallman on the Ninth Circuit Court of Appeals, as a law clerk for Judge Edmond E. Chang on the United States District Court for the Northern District of Illinois, as an associate at Sidley Austin LLP, and as an associate at Keller Lenkner LLC (now known as Keller Postman LLC).

5. I left Keller Postman to found the Civil Rights Group, LLC (which was formerly known as the Law Office of Thomas R. Kayes, LLC). While running the Civil Rights Group, LLC, I was extensively involved in litigating dozens of BIPA class actions in state and federal courts. I joined Loevy + Loevy in May of 2024.

6. I have been appointed class counsel in *Tapia-Rendon v. United Tape & Finishing Co. Inc.*, No. 21-cv-3400, 2023 WL 5228178 (N.D. Ill. Aug. 15, 2023), *reconsideration denied*, No. 21-cv-3400, 2024 WL 406513 (N.D. Ill. Feb. 2, 2024) (BIPA class action against fingerprint-timeclock vendor); *Hosch v. DryBar Holdings LLC*, No. 2021-CH-01976 (Cir. Ct. Cook Cnty., Ill.) (BIPA class action); *Rivera v. Am. Freedom Ins. Co.*, No. 2020-CH-06596 (Cir. Ct. Cook Cnty., Ill.) (BIPA class action); *Bertasiute v. The Hari Group, Inc., et al.*, No. 2020-CH-07055 (Cir. Ct. Cook Cnty., Ill.) (BIPA class action); *Walleye Trading LLC v. AbbVie Inc. et al.*, No. 1:18-cv-05114 (N.D. Ill.) (federal securities class action); and *Dobbey, et al., v. Studer, et al.*, No. 13-cv-1068 (N.D. Ill.) (civil rights class action).

***Class Counsel's Fee Request and Lodestar***

7. Throughout this case, I have tracked and billed time contemporaneously using timekeeping software, as have the non-attorney staff working at my direction.

8. My standard billing rate is \$850.00 per hour. This rate reflects my more than 12 years of experience in complex litigation in federal and state courts in Chicago and throughout the country, Loevy + Loevy's overhead, the firm's additional capacity, and the opportunity cost of my time.

9. I was assisted in this case by two staff members, Ana Molina and Ujvara Fetoshi, both of whom were employed by my former firm, The Civil Rights Group, LLC. Ana Molina was


a paralegal at the firm, and her standard billing rate was \$135.00 per hour. Ujvara Fetoshi was a legal assistant at the firm, and her standard billing rate was \$95.00 per hour.

10. I have reviewed my current and former firm's billing records, and my hours, along with those of Ana Molina and Ujvara Fetoshi, worked on the Class's behalf are reflected in the table below:

Timekeeper	Role	Hourly Rate	Hours Billed	Lodestar
Tom Kayes	Attorney	\$850.00	240.9	\$204,765.00
Ana Molina	Paralegal	\$135.00	2.5	\$337.50
Ujvara Fetoshi	Legal Assistant	\$95.00	11.7	\$1,111.50
<b>Total</b>			<b>255.1</b>	<b>\$206,214.00</b>

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 11, 2026, in Deerfield, Illinois.



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Thomas R. Kayes