

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----x
IN RE: AMERICAN EXPRESS ANTI-STEERING
RULES ANTITRUST LITIGATION

11-MD-02221 (NGG) (RER)

This Document Relates To:
CONSOLIDATED CLASS ACTION

ECF ACTION

-----x
THE MARCUS CORPORATION,
on behalf of itself and all similarly situated persons,

13-CV-07355 (NGG) (RER)

Plaintiff,

- against -

ECF ACTION

AMERICAN EXPRESS COMPANY et al.,

Defendants.

-----x

REPLY DECLARATION OF MARK A. WENDORF

I, Mark A. Wendorf hereby declare as follows:

1. I am a partner in the law firm of Reinhardt Wendorf & Blanchfield, (“RWB”) co-Lead Counsel in the above captioned class action. This reply declaration is made in support of Class Counsel’s response to objections to the Motion For An Award Of Attorneys’ Fees And Costs And Leave To Distribute Service Awards. I hereby declare, based upon my personal knowledge, information provided to me by staff under my supervision, and my co-counsel, and upon a review of documents, that the following is true and correct.

2. Attached as Exhibit A is a copy of Schedule O to the Donor’s Trust Inc. 2011 Form 990 tax filing. As set forth on Schedule O, the Center for Class Action Fairness (CCAF) is one of the Donor’s Trust’s program services and is focused on, inter alia, filing objections to class action settlements that are deemed to be “producing excessive attorneys’ fees.”

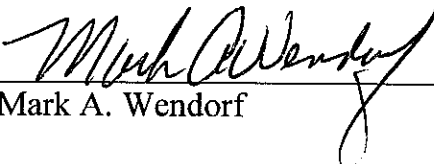
3. The objection of Kevin S. Scheunemann (DE 465) duplicates verbatim many of the legal arguments contained in the objection of William I. Chamberlain in *Delacruz v.*

Cytosport, Inc., 4:11 cv-03532-CW (N.D. Ca.). Attached as Exhibit B is a copy of Mr. Chamberlain's objection in in *Delacruz v. Cytosport, Inc.* This objection was overruled by the district court on July 1, 2014. 4:11-cv-03532, DE 91, at 12.

4. Objector Kevn S. Scheunemann lists his address as Kewaskum, Wisconsin. In July, 2013, the Wisconsin Court of Appeals ordered that Kevin Scheunemann of Kewaskum, Wisconsin be sanctioned for filing a frivolous Action. *Scheunemann v. Chargo*, 349 Wis. 2d 788, at par. 3 (Wis. App. 2013) (unpublished disposition).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 11th day of July, 2014.


Mark A. Wendorf