

NINTH JUDICIAL DISTRICT COURT FOR THE PARISH OF RAPIDES

STATE OF LOUISIANA

NO.: 251,417 c/w NOS. 251,456; 251,515; 252,446; 252,458; and  
252,459

DIVISION B

HELEN MOORE, et al., Individually and on Behalf of All Others Similarly Situated,  
Plaintiffs

versus

MACQUARIE INFRASTRUCTURE AND REAL ASSETS, et al., Defendants

FILED: \_\_\_\_\_

\_\_\_\_\_  
DEPUTY CLERK

**AFFIDAVIT OF CALVIN TRAHAN  
IN SUPPORT OF FINAL APPROVAL OF SETTLEMENT**

STATE OF LOUISIANA    )  
  ) ss:  
PARISH OF LAFAYETTE    )

**BEFORE ME**, the undersigned authority, duly commissioned in and for the state and parish aforesaid, came and appeared:

**CALVIN TRAHAN**

Who, after being sworn, did depose and state as follows:

1. I am a person of the full age of majority, and I am competent to make this affidavit.
2. I submit this affidavit to provide the Court with a description of my efforts in pursuit of this action, and to express my support for the proposed Settlement of this Action.
3. As set forth below, I fully support the proposed \$37 million Settlement of this Action and believe that it is an excellent result for the Class.
4. I have personal knowledge of the matters set forth in this Affidavit, as I have been directly involved in monitoring the prosecution of the Action, as well as the negotiations leading to the Settlement.
5. I have been involved in this action since the fall of 2014, when I filed an initial complaint in the above-captioned action. On September 9, 2019, the Court appointed me, along with Helen Moore and Lawrence L’Herisson, as Class Representatives.
6. I frequently corresponded with Class Counsel at Kahn Swick & Foti, LLC (“Class Counsel”) throughout the pendency of this case. They kept me up to date on the developments in this Action. This included my review of updates regarding all significant events in the Action, as well as frequent meetings regarding the litigation’s progress.
7. I participated in discovery in the Action. I provided Class Counsel with records of my trades in Cleco common stock, which were produced to Defendants in this Action. In addition, I spoke to and corresponded with Class Counsel extensively to respond to Defendants’ discovery requests and to prepare for my deposition. I was deposed by Defendants on July 24, 2019 in connection with my seeking appointment as a Class Representative. My deposition took place in Lafayette, Louisiana and lasted from 9:12 a.m. to 11:52 a.m.
8. I reviewed the key filings in this Action that I received from Class Counsel. In addition, I conferred with Class Counsel on multiple occasions in connection with the mediation and about whether to agree to the Settlement. I have monitored the progress of the litigation in consultation with Class Counsel. In fulfillment of my responsibilities on behalf of all Class Members, I:


- (a) engaged in numerous phone calls, meetings, and communications with Class Counsel;
- (b) provided my input regarding the prosecution of the case during those communications and meetings;
- (c) searched for and provided responsive information pursuant to Defendants' discovery requests;
- (d) extensively prepared for and provided more than two hours of deposition testimony;
- (e) received and reviewed certain material filed in the case and opinions of the Court;
- (f) consulted with Class Counsel and provided input regarding mediation and settlement strategy through conversations with Class Counsel throughout the potential settlement process; and
- (g) considered and approved the proposed Settlement in light of all circumstances concerning the litigation.

9. I am respectfully requesting an award in the amount of \$30,000.00 for the time I devoted to participating in this Action, which was necessary to help achieve an excellent result for the Class. I believe that this amount is fair and reasonable for the amount of time and effort that I devoted to this litigation.

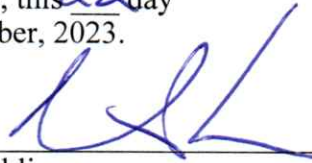
10. I fully support the Settlement for \$37 million for the Class. This is an excellent result achieved by the Class Representatives and Class Counsel, when considering the strengths and weaknesses of the claims and the risks and considerable costs in time and expenses if the Action were to continue.

11. In sum, I respectfully request that the Court approve the Settlement and grant a compensatory award of \$30,000.00 to me in light of my time and effort expended in pursuing the Action.

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

  
\_\_\_\_\_  
Calvin Trahan

SWORN TO AND SUBSCRIBED  
before me, this 22 day  
of December, 2023.

  
\_\_\_\_\_  
Notary Public

Name: Christopher L. Trahan  
Bar/Notary No. Notary Public ID# 53726  
Parish of Lafayette  
Lifetime Commission