

EXHIBIT C

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

**IN RE REV GROUP, INC. SECURITIES
LITIGATION**

Lead Case No. 2:18-cv-1268-LA

**DECLARATION OF GABRIEL YANDOLI IN SUPPORT OF: (1) FINAL APPROVAL
OF SETTLEMENT; AND (2) AN AWARD OF ATTORNEYS' FEES AND EXPENSES
AND AN AWARD TO STATE CLASS REPRESENTATIVES**

I, Gabriel Yandoli, in accordance with 28 U.S.C. § 1746, hereby declare as follows:

1. I am one of the Plaintiffs in the Consolidated State Action and a Class Representative for the purposes of this Settlement.¹ I am also an additional plaintiff in the proposed third amended class action complaint filed in the Consolidated Federal Action. I submit this Declaration in support of the: (i) motion for final approval of settlement; (ii) motion for award of attorneys' fees and litigation expenses; and (iii) my request for the reimbursement of the reasonable costs incurred in connection with my involvement as a plaintiff in the prosecution and resolution of the Actions.

2. I have personal knowledge of the facts as set forth herein and, if called as a witness, I could and would competently testify thereto.

3. On June 26, 2018, I filed a securities class action complaint on behalf of the IPO Class in Wisconsin State Court, in the case styled *Yandoli v. REV Group, Inc. et al.*, No. 2018CV001163 (the "*Yandoli* Action"). On November 5, 2018, Judge Michael Bohren issued an order granting consolidation of related cases in the Consolidated State Action, including the *Yandoli* Action, and appointing Robbins Geller Rudman & Dowd LLP as Interim Class Counsel.

4. In addition, on May 19, 2021, Lead Plaintiff filed a proposed third amended class action complaint naming me as an additional plaintiff in the Consolidated Federal Action, ECF No. 121-1.

5. During my involvement in the Actions, I have dedicated a substantial amount of time monitoring the progress of the litigation and the efforts of Plaintiffs' Counsel on behalf of the Classes. I believe I have faithfully performed my duties as a plaintiff.

¹ Unless otherwise defined herein, capitalized terms shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated May 19, 2021 (Doc. 120-1).

6. Specifically, in connection with this litigation, I: (i) located and produced all documents relevant to my REV Group transactions; (ii) reviewed drafts of filings made in the Consolidated State Action; (iii) reviewed key briefs filed in the Consolidated State Action; (iv) reviewed relevant Court orders; (v) received and reviewed quarterly case reports from counsel; (vi) discussed litigation and settlement strategy with counsel on a regular basis; (vii) participated in settlement discussions and strategy with counsel; and (viii) remained available throughout the settlement process.

7. Throughout the course of the Actions, my attorneys at Johnson Fistel, LLP regularly kept me apprised of the status of the litigation through many written and telephonic communications and conversations.

8. With respect to the settlement process, I engaged in discussions with Johnson Fistel, LLP, concerning the pros and cons of engaging in settlement dialog and the strategies to be employed when negotiating, and in connection with such discussions, provided appropriate settlement authority to Plaintiffs' Counsel. Thereafter, given Plaintiffs' Counsel's vigorous settlement negotiations, as well as my efforts in this matter, the Actions were able to settle for \$14,250,000.00.

9. Given my experience and effort expended in understanding the Actions, and when weighing the merits and risks of the Actions with the benefits of litigating as opposed to settling the Actions, I believe the \$14,250,000.00 settlement is a very good result for the Settlement Class. The Settlement could not have been accomplished without Plaintiffs' Counsel's vigorous prosecution of the Actions. Therefore, I believe the Settlement represents a fair, reasonable, and adequate recovery on behalf of the Settlement Class and that its approval is in the best interest of each Settlement Class Member.

10. Furthermore, I have approved and support Plaintiffs' Counsel's request for an award of attorneys' fees of up to 20% of the Settlement Fund and payment of Plaintiffs' Counsel's requested litigation expenses, with interest on both amounts. Given the high-quality representation, responsiveness, and diligence in prosecuting the Actions, as well as the resulting recovery of \$14,250,000.00 for the Settlement Class in the face of the risk of no recovery at all, I believe Plaintiffs' Counsel's requested award of attorneys' fees and expenses are both fair and just.

11. Pursuant to 15 U.S.C. §77z-1(a)(4) of the Private Securities Litigation Reform Act of 1995, I am seeking reimbursement for the time and expenses I incurred relating directly to my service as a plaintiff and one of the Class Representatives.

12. In accordance with my duties as a plaintiff and Settlement Class Representative, I have not received, nor have I been promised or offered any financial incentive or compensation for serving as a plaintiff and Settlement Class Representative in the Actions. Nevertheless, I understand that courts may authorize an award to a representative serving on behalf of the Settlement Class directly relating to such representation. While I know that the grant of such an award is entirely in the discretion of the Court, it is also my understanding that the Settlement Class has been given notice of the request by the Plaintiffs to seek such an award for their collective efforts in bringing and prosecuting the Actions. I spent approximately 40 hours dedicated to the Actions in connection with my role as a plaintiff and as one of the Class Representatives. A reasonable hourly rate for my time as a retired corporate lawyer is \$200.00 per hour. Applying this hourly rate to the approximately 40 hours I spent in connection with my role in the Actions, the unreimbursed expense for my time is \$8,000.00. This unreimbursed time was reasonably and necessarily incurred in connection with my services to all members of the

Class in this case, and which I believe to be both fair and reasonable. I therefore respectfully request a service award of \$8,000.00 in connection with the time and effort I spent on representing the Settlement Class in the Actions, as detailed herein.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of November, 2021, in Chatham, New Jersey.

DocuSigned by:

Gabriel Yandoli

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GABRIEL YANDOLI