

# **EXHIBIT 11**

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII**

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**IN RE:**

**ESTATE OF FERDINAND E. MARCOS  
HUMAN RIGHTS LITIGATION**

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**MDL NO. 840  
No. 86-390  
No. 86-330**

**THIS DOCUMENT RELATES TO:**

**Hilao et al v. Estate of Ferdinand  
E. Marcos,  
and  
DeVera et al v. Estate of Ferdinand  
E. Marcos.**

**DECLARATION OF  
JEFFREY E. GLEN**

Jeffrey E. Glen declares under penalty of perjury as follows:

1. . I am a shareholder in the law firm of Anderson Kill, P.C. (“Anderson Kill”), co-counsel for the Plaintiff Class. I have acted as New York co-counsel for the Class with Robert Swift in the related case of *Swezey v. Merrill Lynch*, Nos. 104734/2009 and 155600/2013 in the Supreme Court of New York County, New York, wherein the Class is seeking to execute on its judgments against the Marcos Estate. Anderson Kill has also assisted Mr. Swift in litigation in the United States District Court for the District of Columbia in which the United States on behalf of the Republic of the Philippines seeks relief that would if

granted adversely affect these efforts to execute on behalf of the Class in New York. My curriculum vitae is attached as Exhibit "A".

2. I make this Declaration in support of Anderson Kill's application for an interim award of attorneys' fees for services rendered to the Class. The time expended in preparing this Declaration is not included. I also seek reimbursement of expenses reasonably incurred in the course of such representation from July 1, 2013 through December 31, 2018.

3. Anderson Kill's compensation for services rendered is wholly contingent.

4. During the period July 1, 2013 through December 31, 2018, Anderson Kill Rowe incurred expenses in the sum of \$2,594.59. These expenses were reasonably and necessarily incurred in connection with this litigation and are categorized in Exhibit "B" hereto. The expenses incurred are reflected on the books and records of Anderson Kill. These books and records are prepared from checks and expense vouchers which are regularly kept and maintained by Anderson Kill and accurately reflect the expenses incurred.

5. During the period July 1, 2013 through December 31, 2018, Anderson Kill attorneys and paralegals performed 212 hours of work in connection with this litigation. Based upon hourly rates ordinarily charged to Anderson Kill's clients in each of the years 2013 thru 2018, the lodestar value of the time is

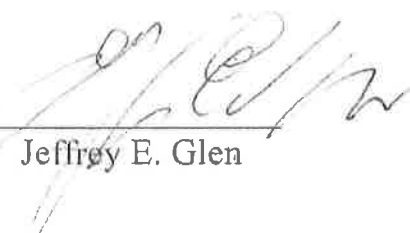
\$85,658.50. Attached hereto as Exhibit "C" is a detailed list of the hours Anderson Kill personnel devoted to the litigation and the nature of the services performed.

6. All of the services performed by Anderson Kill in connection with this litigation were in coordination with Mr. Swift, reasonably necessary in the prosecution of this case, and of the type which would be charged to an hourly fee paying client. There has been no unnecessary duplication of services.

7. The hourly rates listed in Exhibit "C" are the rates charged to and paid by Anderson Kill's normal hourly rate paying clients in each of the years 2013 thru 2018. No adjustment was made, notwithstanding the complexity of the matters involved, the opposition encountered, the preclusion of other employment, the delay in payment, or the factors present in this case which might justify a higher rate of compensation.

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

February 4 , 2019



Jeffrey E. Glen