

EXHIBIT 3

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

IN RE:	}	MDL NO. 840
	}	No. 86-390
ESTATE OF FERDINAND E. MARCOS	}	No. 86-330
HUMAN RIGHTS LITIGATION	}	
	}	
THIS DOCUMENT RELATES TO:	}	DECLARATION OF
	}	ROBERT A. SWIFT
Hilao et al v. Estate of Ferdinand	}	
E. Marcos,	}	
and	}	
DeVera et al v. Estate of Ferdinand	}	
E. Marcos.	}	

Robert A. Swift declares under penalty of perjury as follows:

1. I am a senior member in the law firm of Kohn Swift & Graf, P.C. (the "Firm"), counsel for the Plaintiff Class in the above-captioned action. I am also the Lead Counsel for the Class.

2. I make this Declaration in support of the Firm's application for a second interim award of attorneys' fees for services rendered to the Class certified in the above-captioned litigation. 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.

Costs incurred in the 2014 distribution of compensation to Class members was already reimbursed to my firm, so that is not included in the costs presented herein.

3. The firm's compensation for services rendered is wholly contingent. I acted as Lead Counsel and chief trial counsel in this litigation from its inception in 1986. My curriculum vitae is attached as Exhibit 4.

4. During the period July 1, 2013 through December 31, 2018, the Firm incurred expenses in the sum of \$67,510.38. These expenses are exclusive of expenses reimbursed by the Court in 2006, 2011 and 2013. These expenses were reasonably and necessarily incurred in connection with this litigation and are categorized and detailed in Exhibit 5 hereto. The expenses incurred are reflected on the books and records of the Firm. These books and records are prepared from checks and expense vouchers regularly kept and maintained by the Firm and accurately reflect the expenses incurred.

5. During the period July 1, 2013 through December 31, 2018, lawyers and paralegals of the Firm performed 4,249 hours of work in connection with this litigation. The nature of the services performed for this period is described in a separate Declaration submitted contemporaneously herewith. Based upon current hourly rates ordinarily charged to the Firm's clients, the lodestar value of the time is \$2,863,545. Attached hereto as Exhibit 6 is a chart which identifies the Firm's attorneys and paralegals who worked on this litigation, their hourly

rates, their respective lodestar values and itemization of the work performed. Some of the paralegals who worked on the case have left the Firm's employ. For those persons, their hourly rate is the last rate charged for their services by the Firm.

6. A (first) Joint Interim Fee Motion was filed with this Court in November 2010. (ECF # 10634) In support of that Petition, detailed itemization of the services rendered in the main case was submitted to the Court, docketed at ECF #'s 10635 thru 10651, and published on the Firm's website. A (second) Joint Interim Fee Motion was filed with this Court in August 2013. (ECF # 10702) In support of that Petition, detailed itemization of the services rendered in the main case was submitted to the Court, docketed at ECF # 10702 -1 to -22, and published on the Firm's website. Class Notice was given to all eligible Class members in December 2010 and October 2013 as to where they could find fee and cost information. That compendium of fee information for the period prior to July 1, 2013 is summarized in Exhibit 1. Itemization of the time and costs of all attorneys from July 1, 2013 through December 31, 2018 is being filed on ECF and is being placed on this Firm's website as part of the Class Notice currently being given to Class members.

7. The chart attached as Exhibit 1 shows the accumulated joint lodestar of plaintiffs' counsel in this case from 1986 through June 30, 2013 as well as the

additional lodestar for the period July 1, 2013 through August 31, 2018. After deducting prior fee awards, the accumulated and unpaid lodestar for all counsel in the case as of August 31, 2018 is \$21,072,947. The 30% fee requested by plaintiffs' counsel constitutes a mere 19.6% of counsels' overall net lodestar.

8. All of the services performed by the Firm in connection with this litigation were reasonably necessary in the prosecution of this case and of the type which would be charged to an hourly fee paying client.

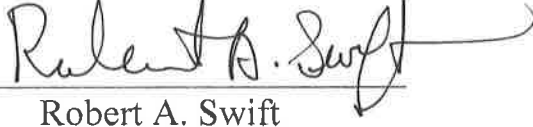
9. There has been no unnecessary duplication of services for which the Firm now seeks compensation.

10. The rates at which the Firm seeks compensation are its usual and customary hourly rates charged for work performed for and paid by other clients. 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. My rate of \$750 per hour is the current rate charged to and paid by my normal hourly rate paying clients. I applied this hourly rate only to work performed from July 1, 2013 and ending August 31, 2018. I have not changed the (lower) hourly rate applicable to work performed prior to July 1, 2013.

11. My firm and I have been materially involved in all aspects of this litigation, including settlement negotiations. As Lead Counsel, I have been

involved in every aspect of this litigation. A detailed description of the work performed is set forth in my separate Declaration – Exhibit 2.

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


Robert A. Swift

February 11, 2019