

EXHIBIT E

1 I, Robert Betts, declare as follows:

2 1. I am the Executive Director of Class Representative National Elevator Industry
3 Pension Fund (the “Fund”). As Executive Director, I participate in, and oversee decisions regarding
4 the administration of the Fund. I have overseen the Fund’s participation in this matter since
5 November 2016, when the Fund filed a motion to serve as lead plaintiff in this Action. I respectfully
6 submit this declaration in support of final approval of the proposed settlement (the “Settlement”).

7 2. The Fund is a Taft-Hartley multi-employer defined benefit plan. It was established in
8 1962 and oversees billions of dollars in assets. The Fund provides pension benefits to union elevator
9 constructors all over the United States.

10 3. The Fund has participated in and monitored the progress of this Action since it was
11 commenced. Specifically, the Fund, directly and through its counsel, O’Donoghue & O’Donoghue
12 LLP, has participated in numerous meetings and conference calls with Robbins Geller Rudman &
13 Dowd LLP, closely followed the procedural developments in the case, reviewed motions and briefs
14 with the Court, responded to discovery requests, and participated in settlement discussions. For
15 example, in my role as Executive Director, I personally reviewed and produced hundreds of pages of
16 documents and answered interrogatories. I also spent a considerable amount of time preparing for
17 and providing deposition testimony.

18 4. As part of its duties as Class Representative, the Fund was committed to optimizing
19 the outcome of this Action. The Fund believes that the proposed settlement amount of \$809.5
20 million represents an outstanding result for the Class and the proposed settlement merits the Court’s
21 approval.

22 5. While the Fund understands that the determination of attorneys’ fees is left to the
23 Court, the Fund supports Co-Lead Counsel’s application for 22.5% of the settlement amount and
24 expenses in an amount not to exceed \$4 million. The Fund believes the request is fair, reasonable
25 and appropriate as this Settlement would not have been possible without the diligent efforts of
26 Robbins Geller and its co-counsel, who vigorously litigated this case right up until the scheduled
27 trial date.

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