

EXHIBIT 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MONROE COUNTY EMPLOYEES')	Civil Action No. 1:17-cv-00241-WMR
RETIREMENT SYSTEM and)	
ROOFERS LOCAL NO. 149 PENSION)	<u>CLASS ACTION</u>
FUND, Individually and on Behalf of)	
All Others Similarly Situated,)	DECLARATION OF DARRIS
)	GAROUFALIS IN SUPPORT OF
Plaintiffs,)	APPLICATION FOR FINAL
)	APPROVAL OF CLASS ACTION
vs.)	SETTLEMENT AND AWARD OF
)	ATTORNEYS' FEES AND
THE SOUTHERN COMPANY,)	EXPENSES
THOMAS A. FANNING, ART P.)	
BEATTIE, EDWARD DAY, VI, G.)	
EDISON HOLLAND, JR., JOHN C.)	
HUGGINS and THOMAS O.)	
ANDERSON,)	
)	
)	
)	
Defendants.)	
_____)	

I, Darris Garoufalis, declare as follows:

1. I am the Fund Administrator of Lead Plaintiff and Class Representative Roofers Local No. 149 Pension Fund (“Roofers Local No. 149”), which is based in Troy, Michigan, and holds approximately \$250 million in assets for the benefit of more than 2,300 participants. I respectfully submit this declaration in support of: (a) final approval of the \$87,500,000 settlement (the “Settlement”) in the above-captioned case (the “Litigation”) reached between Roofers Local No. 149 and fellow Class Representative Monroe County Employees’ Retirement System, on behalf of themselves and the Class, and the defendants in the Litigation; and (b) approval of Lead Counsel Robbins Geller Rudman & Dowd LLP’s (“Robbins Geller”) application for an award of attorneys’ fees, and expenses and charges.

2. Roofers Local No. 149 understands that the Private Securities Litigation Reform Act of 1995 (“PSLRA”) was intended to encourage institutional investors with large losses to manage and direct securities class actions. In seeking appointment as Lead Plaintiff, and later as Class Representative, Roofers Local No. 149 understood its fiduciary duty to serve in the interests of the Class by supervising the management and prosecution of the case. Roofers Local No. 149 vigorously prosecuted this case on behalf of the Class for more than three years. Ultimately, Roofers Local No. 149 agreed to settle the case after balancing the risks of further

litigation, trial, and appeals, if we prevailed, against the immediate benefit of an \$87,500,000 recovery.

3. Following appointment as Lead Plaintiff, Roofers Local No. 149 was kept fully informed regarding case developments and procedural matters over the course of the Litigation, including engagement with Robbins Geller concerning the Litigation strategy in connection with dispositive motions, discovery, class certification, and the potential resolution of this action. In its capacity as Lead Plaintiff, Roofers Local No. 149 also: (a) reviewed pleadings and briefs submitted in this matter and correspondence concerning the status of the case; (b) identified and provided relevant information during the discovery process; (c) provided testimony at a deposition pursuant to Federal Rule of Civil Procedure 30(b)(6); and (d) evaluated the risks of continuing Litigation, including the possibility of a nominal recovery or even no recovery at all. Accordingly, Roofers Local No. 149 authorized Robbins Geller to settle this action for \$87,500,000 and believes this Settlement is fair and reasonable, represents an excellent recovery, and is in the best interest of the Class.

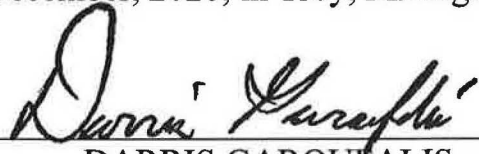
4. While Roofers Local No. 149 recognizes that any determination of fees is left to the Court, Roofers Local No. 149 believes that Robbins Geller's request for fees of 30% of the Settlement and expenses of \$853,866.45, plus interest on both

amounts, is fair and reasonable, as this Settlement would not have been possible without the diligent and aggressive prosecutorial efforts of Robbins Geller.

5. Roofers Local No. 149 and its staff spent many hours overseeing the prosecution of this Litigation on behalf of the Class – time that would otherwise have been focused on daily business activities of Roofers Local No. 149. Nevertheless, Roofers Local No. 149 is not seeking any PSLRA-authorized reimbursement from the Settlement for the time it devoted to serving as Lead Plaintiff.

6. Roofers Local No. 149 respectfully requests that the Court grant final approval of the Settlement and Robbins Geller's application for an award of attorneys' fees and expenses.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed this 7th day of December, 2020, in Troy, Michigan.


DARRIS GAROUFALIS