

EXHIBIT A

**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 ERIN PERALES IN SUPPORT OF FINAL APPROVAL OF THE
SETTLEMENT, AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES,
AND REIMBURSEMENT OF EXPENSES FOR LEAD PLAINTIFF**

I, Erin Perales, hereby declare, under the penalty of perjury, as follows:

1. I am General Counsel for the Houston Municipal Employees Pension System (“HMEPS”). Since August 2018, my duties have included providing legal advice in the above-captioned consolidated securities class action (the “Action”) to Lead Plaintiff HMEPS.¹ I directly represented HMEPS in the prosecution and settlement of this Action and have had regular contact with HMEPS’ outside counsel, Bernstein Liebhard LLP (“Bernstein Liebhard”), throughout the course of this litigation.

2. I submit this declaration in support of the final approval of the proposed Settlement, an award of Plaintiffs’ Counsel’s attorneys’ fees and reimbursement of expenses, and an award to HMEPS of \$6,475 for the reimbursement of the reasonable costs and expenses incurred in connection with its direct representation of the Classes. The statements contained herein are based upon my personal knowledge and upon information made available to me in my official capacity.

A. Background

3. HMEPS is a governmental defined benefit pension plan that provides retirement, disability and survivor benefits for eligible employees of the City of Houston and HMEPS. Created in 1943, HMEPS currently has over 28,000 participants. It is my job to provide legal advice and counsel to HMEPS. In that role, I oversee and supervise the activities of outside law firms representing HMEPS.

4. As an institutional investor and public pension fund, HMEPS takes very seriously its responsibility to oversee the prosecution of securities class actions.

¹ All defined terms contained in this Declaration shall have the same meanings as set forth in the Stipulation and Agreement of Settlement dated May 19, 2021 (the “Stipulation”).

5. During the period January 17, 2017 through June 7, 2018, inclusive (the “Class Period”), HMEPS purchased shares of REV Group common stock on the open market. HMEPS suffered substantial losses as a result of misstatements and omissions during the Class Period. For that reason, HMEPS was highly motivated to work with Lead Counsel to see that the recovery was maximized for REV Group investors.

6. Accordingly, HMEPS decided to seek appointment as a lead plaintiff in the Action and carefully considered retaining outside counsel to litigate the Action. Bernstein Liebhard was ultimately selected.

7. By order dated September 19, 2018, the Court appointed HMEPS as Lead Plaintiff. Bernstein Liebhard, outside counsel for HMEPS, was appointed Lead Counsel.

B. The Litigation of the Action

8. At the direction of HMEPS, I, along with my colleague, Rachel Feibus, Assistant General Counsel for HMEPS, carefully monitored and were actively involved in the prosecution of the Action and supervised the activities of Bernstein Liebhard on behalf of the Classes and HMEPS. Among other things, Ms. Feibus and I: (i) reviewed and provided comments on three amended complaints and opposition to two motions to dismiss; (ii) had extensive and regular telephonic and email communications with Bernstein Liebhard regarding strategy, damages, and developments in the Action; (iii) reviewed briefing in connection with REV Group’s motion to disqualify HMEPS and Bernstein Liebhard, and provided comments to the opposition papers; (iv) reviewed and approved the retention of a damages consultant; (v) participated in settlement negotiations; and (vi) reviewed and approved the Settlement.

9. No major decisions were made by Lead Counsel in this case without the prior review and approval of HMEPS.

C. Settlement Discussions

10. Because of our close supervision of the Action, Ms. Feibus and I believed that we were well-positioned and qualified to evaluate the reasonableness and adequacy of any settlement for this Action.

11. On March 15, 2021, the Parties reached an agreement in principle to settle the Action. The agreement was subject to approval by HMEPS. I, together with Ms. Feibus, actively reviewed and commented on the terms of the proposed settlement and its memorialization in the Memorandum of Understanding (“MOU”) and the subsequent Stipulation and Agreement of Settlement.

12. Based on our involvement in the prosecution and settlement of this Action, HMEPS strongly endorses the Settlement, and believes it provides a good result for the Classes.

D. The Plan of Allocation

13. Based on the explanation of the analysis of the proposed Plan of Allocation completed by Lead Plaintiff’s retained financial consultant in the Action, we endorse the proposed Plan of Allocation. We understand from our discussions with Bernstein Liebhard that the Plan of Allocation represents a fair and reasonable method for valuing claims submitted by members of the Classes, and for distributing the Net Settlement Fund to members of the Classes who submit valid and timely Claim Forms.

E. Plaintiffs’ Counsel’s Fee and Expense Application

14. As a Lead Plaintiff, HMEPS takes very seriously its role to ensure that the attorneys’ fees are fair in light of the result achieved for the Classes and reasonably compensate Plaintiffs’ Counsel for the work involved and substantial risks they undertook in litigating the Action on a contingency basis.

15. HMEPS endorses the application for attorneys' fees of 20% of the Settlement.

16. I understand that this fee payment, if approved by the Court, will cover all Plaintiffs' Counsel who contributed to the prosecution of the Action. HMEPS believes that such approval is warranted as the payment represents a fair and reasonable fee to Plaintiffs' Counsel for their efforts in prosecuting the Action along with Lead Counsel.

17. HMEPS further believes that the litigation expenses being requested for reimbursement were necessary for the prosecution and successful resolution of the Action. Therefore, HMEPS endorses the application by Plaintiffs' Counsel for the reimbursement of their litigation expenses.

F. HMEPS' PSLRA Expense Reimbursement Application

18. HMEPS spent considerable time and incurred reasonable costs and expenses directly related to its representation of the Classes, including: (i) reviewing and providing comments on three amended complaints and opposition to two motions to dismiss; (ii) extensive and regular telephonic and email communications with Bernstein Liebhard regarding strategy, damages, and developments in the Action; (iii) reviewing briefing in connection with REV Group's motion to disqualify HMEPS and Bernstein Liebhard, and providing comments to the opposition papers; (iv) approving the retention of a damages consultant; (v) participating in settlement negotiations and attending one of the Court's telephonic hearings; and (vi) reviewing and approving the Settlement. The hours, personnel and reasonable cost amounts are set forth

below:

Name	Hours	Rate	Reasonable Costs
Erin Perales, General Counsel	19	\$175	\$3,325
Rachel Feibus, Assistant General Counsel	18	\$175	\$3,150

19. The chart above shows that HMEPS spent a total of \$6,475 in time and expenses in performing its role as lead plaintiff.

20. In light of the work performed by HMEPS in the fulfillment of its fiduciary obligations to the Classes, HMEPS believes that the requested cost and expense payment of \$6,475 is fair and reasonable and warrants this Court's approval.

CONCLUSION

21. Accordingly, HMEPS respectfully requests that the Court approve the Settlement, the Fee and Expense Application, and the reimbursement application of HMEPS of its reasonable costs and expenses incurred in directly prosecuting the Action on behalf of the Classes in the amount of \$6,475.

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

Executed this 4th day of November, 2021



Erin Perales
General Counsel to Houston Municipal
Employees Pension System