

# Exhibit A

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF IOWA  
WESTERN DIVISION**

IN RE: IOWA READY-MIX CONCRETE  
ANTITRUST LITIGATION

No. 5:10-CV004038-MWB  
(CONSOLIDATED CASES)

**DECLARATION OF MICHELLE M. LA COUNT, ESQ.**

I, Michelle M. La Count, Esq., declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am the Vice President of Case Management with A.B. Data, Ltd.'s Class Action Administration Division ("A.B. Data") with offices located in Milwaukee, Wisconsin; West Palm Beach, Florida; and New York, New York.
2. I submit this Declaration at the request of Class Counsel in connection with the class action settlement administration proceedings in *In re Iowa Ready-Mix Concrete Antitrust Litigation*, Consolidated Case No.: 5:10-CV004038-MWB (the "Action").
3. This Declaration is based upon my personal knowledge and upon information provided by Class Counsel, my associates, and staff.
4. At the request of Class Counsel A.B. Data has prepared estimates of future administration fees and expenses associated with the Action for each of the settlements.
5. It is anticipated that the estimated cost of the administrations for each class of claimants will total as follows through case conclusion, inclusive of any amounts billed to date whether paid or outstanding, assuming only one distribution is required and the Settlement Funds terminate by the end of 2012:

a.	Alliance/Tri-State	\$44,175 Total Cost
b.	Alliance/Great Lakes	\$75,870 Total Cost
c.	Alliance/Siouxland Settlement	\$46,997 Total Cost

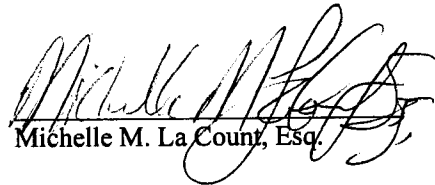
6. These estimates were based on prior pricing submitted to and approved by Class Counsel as amended per changes to the plan for notice, claims and distribution by Class Counsel as data became available that allowed for updating of the plan to provide the most cost effective, efficient, and simple means of participation for class members in all three settlements.

7. The estimated amounts are subject to change based on actual work performed pursuant to the quantity of claims actually received and how many of those claims require expanded claim documentation review.

8. These estimates are being provided solely for the use of Class Counsel in providing illustrative overall recovery estimates for the Court; they in no way represent a maximum or minimum amount to be billed for each settlements' administration.

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

Executed this 8<sup>th</sup> day of December 2011.

  
Michelle M. La Count, Esq.