

## **EXHIBIT 4**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE WEATHERFORD INTERNATIONAL  
SECURITIES LITIGATION

11 Civ. 1646 (LAK) (JCF)

CLASS ACTION

**DECLARATION OF JAMES R. MEYNARD, FORMER EXECUTIVE DIRECTOR  
OF GEORGIA FIREFIGHTERS' PENSION FUND IN SUPPORT OF (A) PLAINTIFFS'  
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN  
OF ALLOCATION; (B) LEAD COUNSEL'S MOTION FOR AN AWARD OF  
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES; AND  
(C) PLAINTIFFS' REQUEST FOR REIMBURSEMENT OF COSTS AND EXPENSES**

I, JAMES RUSSELL MEYNARD, hereby declare under penalty of perjury as follows:

1. I served as the Executive Director of Georgia Firefighters' Pension Fund ("GFPF") from July 2002 through my retirement from GFPF on April 30, 2014. C. Morgan Wurst currently serves as GFPF's Executive Director.<sup>1</sup> GFPF was established as a voluntary pension system in 1955 by the Georgia General Assembly, to supplement primary pension benefits provided by entities establishing fire departments. GFPF's mission is to supplement the welfare and well-being of Georgia firefighters and their surviving beneficiaries when they, the firefighters, retire from the fire service and to provide prudent stewardship to the assets held in trust that support this mission. GFPF currently manages approximately \$740 million in assets.

2. I submit this declaration in support of (a) Plaintiffs' motion for final approval of the proposed Settlement and approval of the proposed Plan of Allocation; (b) Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses; and (c) GFPF's request to recover the reasonable costs and expenses incurred in connection with its

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<sup>1</sup> Mr. Wurst was named Interim Deputy Director after I announced my plans to retire in December 2013. Mr. Wurst joined GFPF in 2009 as Assistant Treasurer and in this capacity, also performed work on behalf of the Settlement Class. See ¶12 herein.

representation of the Settlement Class in the prosecution and resolution of the above-captioned litigation (the “Action”).

3. On April 5, 2013, the Court entered the parties’ stipulation to add GPF as a named plaintiff in the Action pursuant to Fed. R. Civ. P. 21. I have personal knowledge of the matters set forth in this declaration, as I have been involved in monitoring and overseeing the prosecution of the Action as well as the negotiations leading to the Settlement since GPF was added as an additional named plaintiff in the Action, and I could and would testify competently thereto.

4. Prior to the parties’ stipulation to add GPF as a named plaintiff in the Action, I, on behalf of GPF, discussed with Darren Check, Esq. of Kessler Topaz Meltzer & Check, LLP (“KTMC”), Court-appointed Lead Counsel, the responsibilities of serving as a named plaintiff and a representative for the class, GPF’s commitment to fulfilling these responsibilities, and the factual and legal bases for the claims asserted against the defendants in this Action.

5. Following GPF’s addition as a named plaintiff in the Action, I had regular communications with attorneys from KTMC, and through my active involvement, as well as through others working under my supervision (as detailed in ¶12 below), GPF supervised, monitored, and was involved in all material aspects of the prosecution and resolution of the Action. GPF received periodic status reports from KTMC on case developments, and participated in regular discussions with attorneys from KTMC concerning the prosecution of the Action, the strengths of and risks to the claims and potential settlement. In particular, I, as well as other GPF employees working under my supervision:

(a) participated in telephonic and in-person discussions with KTMC as well as received and reviewed periodic updates from KTMC concerning significant developments in the litigation, including case strategy;

(b) reviewed significant pleadings and briefs filed in the Action, such as the Amended Complaint for Violation of the Federal Securities Laws and Plaintiffs' motion for class certification;

(c) consulted with KTMC regarding analysis of retained experts;

(d) supervised the production of discovery by GPF, including overseeing electronic searches and searches of custodial files in response to requests for the production of documents and in response to written document requests;

(e) was designated to testify on GPF's behalf in connection with defendants' 30(b)(6) deposition in connection with Plaintiffs' class certification motion, which required me to interface with other GPF professionals in order to obtain sufficient knowledge to adequately respond to questions related to the topics set forth in the deposition notice;

(f) prepared for and sat for a deposition on April 18, 2013 in connection with Plaintiffs' class certification motion;

(g) consulted with KTMC concerning the settlement negotiations as they progressed;  
and

(h) evaluated and recommended the approval of the proposed settlement for \$52.5 million in cash to GPF's board of trustees.

6. GPF was involved in all aspects of the negotiations which led to the Settlement, including the mediation briefing, the formal mediation with the Hon. Daniel H. Weinstein (Ret.) in June 2013, and the follow up settlement negotiations which ultimately led to this resolution.

7. Based on its involvement in the Action, GPF strongly endorses the Settlement and believes it provides an excellent recovery for the Settlement Class, particularly in light of the substantial risks of continuing to prosecute the claims in the Action.

8. GFPP has approved Lead Counsel's request for an award of attorneys' fees in the amount of \$12.6 million, which amount approximates Lead Counsel's lodestar in this Action, and believes that it is fair and reasonable in light of the work Lead Counsel performed on behalf of the Settlement Class. GFPP believes an award of attorneys' fees in the requested amount is fair in light of the result achieved for the Settlement Class and reasonably compensates Lead Counsel for the work involved and the substantial risks they undertook in litigating the Action.

9. GFPP further believes that the litigation expenses being requested for reimbursement by Lead Counsel are reasonable, and represent costs and expenses necessary for the prosecution and resolution of the claims in the Action. Based on the foregoing, GFPP fully supports Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses.

10. GFPP also supports approval of the proposed Plan of Allocation which is based on the analysis completed by the damages expert retained in this Action. GFPP believes that the plan represents a fair and reasonable method for allocating the net settlement proceeds to Settlement Class Members whose claims are approved for payment.

11. In connection with Lead Counsel's request for reimbursement of litigation expenses, GFPP seeks reimbursement for the costs and expenses that it incurred directly relating to its representation of the Settlement Class in the Action. GFPP makes this request pursuant to Section 21D(a)(4) of the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4).

12. In my capacity as GFPP's Executive Director, I was responsible for, among other things, managing GFPP's staff, overseeing the membership of the pension fund and overseeing



the investment managers and cash management. I reported directly to GFPP's board of trustees. I estimate that I personally spent 33.5 hours in connection with the responsibilities and tasks outlined above for purposes of representing the Settlement Class as set forth in the chart below. In addition, in working on this Action, I was assisted by three other GFPP employees, including the following:

<b>Employee</b>	<b>Hours</b>	<b>Hourly Rate</b>	<b>Total Cost</b>
James Meynard, Executive Director	33.5	\$106.84	\$3,579.14
Morgan Wurst, Assistant Treasurer	31	\$56.9625	\$1,765.84
Darlene McMillan, Accountant	12	\$34.1775	\$410.13
Tim Snow, IT Contractor	3	\$130.00	\$390.00
<b>TOTAL:</b>	<b>79.5</b>		<b>\$6,145.11</b>


13. The time that these colleagues and I devoted to the representation of the Settlement Class in this Action was time that we otherwise would have spent on other work for GFPP and, thus, represented a cost to GFPP. I calculated hourly rates for myself and the other individuals working on this matter by dividing our annual salaries by the amount of hours we typically work in a year to obtain the hourly rates set forth in the above chart and then applied that hourly rate to the hours we each provided in service of the Settlement Class. In total, GFPP seeks reimbursement in the amount of \$6,145.11 for the time the employees set forth in the chart above devoted to this Action. In sum, GFPP personnel, spent a total of 79.5 hours on the prosecution of this Action for the benefit of the Settlement Class which included the following tasks: regular written and oral communications with KTMC; review and approval of strategic

decisions; review, analysis and commenting on pleadings, including plaintiffs' motion for class certification; gathering and reviewing documents in response to discovery requests, which included electronic discovery and custodial file searches that ultimately led to the production of approximately 2,760 pages of documents, conferring with GFPP personnel; preparation for and attendance at a 30(b)(6) deposition; and involvement in the negotiations producing the Settlement.

14. In conclusion, following its addition as a named plaintiff, GFPP was closely involved in the prosecution and settlement of the claims in this Action, strongly endorses the Settlement as fair, reasonable and adequate, and believes that it represents a significant recovery for the Settlement Class and also supports approval of the proposed Plan of Allocation. Accordingly, GFPP respectfully requests that the Court approve Plaintiffs' motion for final approval of the proposed Settlement, approval of the Plan of Allocation, Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses, and GFPP's request for reimbursement of its reasonable costs and expenses incurred in prosecuting and resolving the Action on behalf of the Settlement Class, as set forth above.

15. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I have authority to execute this declaration on behalf of GFPP.

Executed this 20<sup>th</sup> day of May, 2014.

  
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JAMES R. MEYNARD  
*Former Executive Director  
Georgia Firefighters' Pension Fund*