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22 *Interim Co- Lead Counsel for Indirect Purchaser Plaintiffs*

23
24 **UNITED STATES DISTRICT COURT**
25
26 **NORTHERN DISTRICT OF CALIFORNIA**
27
28 **OAKLAND DIVISION**

29 **IN RE: LITHIUM ION BATTERIES**
30 **ANTITRUST LITIGATION**

Case No. 13-MD-02420 YGR (DMR)

MDL NO. 2420

**DECLARATION OF ADAM J. ZAPALA
IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS' MOTION
FOR AN AWARD OF ATTORNEYS'
FEES AND REIMBURSEMENT OF
EXPENSES ON BEHALF OF COTCHETT,
PITRE & MCCARTHY, LLP**

31 **This Document Relates to:**
32
33 **ALL INDIRECT PURCHASER ACTIONS**

1 I, Adam J. Zapala, declare:

2 1. I am a partner at the law firm of Cotchett, Pitre, & McCarthy, LLP (“CPM”), one of
3 the law firms appointed by this Court to serve as Co-Lead Class Counsel for Indirect Purchaser
4 Plaintiffs (“IPPs” or “Plaintiffs”) in this action.¹ See ECF No. 194 at 2.

5 2. I submit this declaration in support of IPPs’ Motion for an Award of Attorneys’ Fees
6 and Reimbursement of Expenses. I make this declaration based on my personal knowledge, and if
7 called as a witness, I could and would competently testify to the matters stated herein.

8 3. CPM served as counsel for IPPs during this litigation. The background and
9 experience of CPM and its attorneys are summarized in the curriculum vitae attached hereto as
10 **Exhibit A.**

11 **Adam J. Zapala**

12 4. I am a Partner at CPM and along with my litigation team have continuously worked
13 on complex antitrust and competition cases. I have handled class and non-class cases. My class
14 action experience includes leadership positions in many multidistrict litigations including this case.
15 I have been part of teams that have recovered over \$2 billion in damages for classes and individual
16 clients.

17 5. I, and my firm, have frequently been appointed as lead class counsel in large
18 antitrust cases, including indirect purchaser antitrust cases like this one, and have a proven track
19 record of success in those cases. I have served in served in leadership positions on the following
20 major antitrust and complex matters, among others: *Precision Associates et al. v. Panalpina World*
21 *Transport et. al.*, No. 08-CV-00042-JG-VVP (E.D. N.Y.) (recovering over \$400 million on behalf
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23
24 ¹ Through this declaration the term “Co-Lead Counsel” refers to Cotchett, Pitre &
25 McCarthy, LLP, Hagens Berman Sobol Shapiro LLP, and Lieff Cabraser Heimann & Bernstein,
26 LLP. The term “Supporting Counsel” refers to the law firms that assisted Class Counsel in
litigating this case. The term “Class Counsel” refers to the all the attorneys and firms that worked
on behalf of IPPs in this case, including Co-Lead Counsel and Supporting Counsel.
27

1 of plaintiffs' class); *In re Automotive Parts Antitrust Litigation*, No. 12-md-02311 (E.D. Mich.) (to
2 date, recovering over \$1B on behalf of indirect purchasers); *In re Transpacific Air Passenger*
3 *Transportation Antitrust Litigation*, No. 07-CV-5634-CRB, MDL 1913 (N.D. Cal.) (ongoing case
4 recovering over \$140 million on behalf of plaintiffs' class); *In re Capacitors Antitrust Litigation*,
5 Case No. 3:14-cv-03264 (N.D. Cal.) (ongoing case where indirect purchasers have recovered over
6 \$30 million to date); *In re Resistors Antitrust Litigation*, No. 15-cv-03820-JD (N.D. Cal.) (ongoing
7 case with recovery of \$33.4 million); *In re Vizio, Inc. Consumer Privacy Litigation*, No. 16-md-
8 02693-JLS (C.D. Cal.) (cutting edge privacy litigation on behalf of plaintiffs' class).

9 6. I have been involved in this case in a day-to-day role and supervising the work of
10 our team within the firm, overseeing the work of other firms working on behalf of the class.

11 **Joseph W. Cotchett**

12 7. CPM Senior Partner Joseph W. Cotchett has also been involved in this case since it
13 began, in particular providing strategic leadership and guidance on all aspects of case prosecution
14 and settlement. As stated by *The National Law Journal*, Mr. Cotchett is considered by plaintiffs
15 and defense attorneys alike to be one of the foremost trial lawyers in the country, having tried
16 more than 100 cases to verdict in jurisdictions across the country during a career that has spanned
17 more than 50 years. He has been named one of the 100 most influential lawyers in the nation for
18 the past 15 years. He is a Fellow of the prestigious American College of Trial Lawyers and The
19 International Society of Barristers and an Advocate in the American Board of Trial Advocates. He
20 also is a Fellow and former board member of The International Academy of Trial Lawyers. He is
21 the author of several books, including *Federal Courtroom Evidence*.

22 8. Mr. Cotchett was named Antitrust Lawyer of the Year in 2011 by the State Bar of
23 California Antitrust and Unfair Competition Section, and I believe has tried more antitrust cases to
24 verdict than any lawyer presently before this Court. He is known nationally as the trial lawyer for
25 23,000 plaintiffs in the *Lincoln Savings & Loan Association/American Continental Corp.* case
26 involving Charles Keating, winning one of the largest jury verdicts in U.S. history, \$3.3 billion.

1 **Tamarah P. Prevost**

2 9. Tamarah P. Prevost has substantial experience prosecuting antitrust, securities
3 litigation, complex class actions, *qui tam* cases and complex commercial litigation.

4 10. Ms. Prevost has extensive discovery experience in complex antitrust class actions.
5 Ms. Prevost has coordinated meet and confer processes in large complex class actions, and has
6 significant experience taking depositions, requesting and responding to discovery. She recently
7 second-chaired a jury trial to verdict.

8 11. Ms. Prevost also represents plaintiffs in the following antitrust class actions in
9 which CPM serves as interim lead or co-lead counsel: *In re Broiler Chicken Antitrust Litigation*,
10 No. 1:16-cv-08637 (N.D. Ill.); *In re Capacitors Antitrust Litigation*, No. 3:14-cv-03264-JD (N.D.
11 Cal.); and *In re Resistors Antitrust Litigation*, No. 5:15-cv-03820-RMW (N.D. Cal.).

12 **Tracy Lee**

13 12. Ms. Lee is a Korean and Japanese language attorney performing document review.
14 Ms. Lee received a J.D. from Benjamin N. Cardozo School of Law. She is a document review
15 specialist with a B.A. in Japanese from UCLA. In August of 2015, after working on this case at
16 Lief Cabraser Heimann & Bernstein, Ms. Lee began working for our firm to continue her analysis
17 of foreign language documents produced by Defendants in this case.

18 **Michael Caylao**

19 13. Michael Caylao is a paralegal at the firm who has had day-to-day responsibilities
20 for assisting the attorneys in all aspects of the case, including document collection and review,
21 deposition preparation, coordination with class representatives and their counsel and scheduling.

22 **SUMMARY OF WORK PERFORMED**

23 14. As demonstrated by the exceptionally long docket, every aspect of this case has
24 been vigorously contested by some of the most sophisticated defense counsel in the country.

25 15. Since CPM's appointment as Co-Lead Counsel, CPM and Co-Lead Counsel have
26 actively litigated this case and have supervised the activities of Supporting Counsel. In addition to
27 its supervisory role, CPM has performed the following work:

- 1 • Supervised and directed the work of Supporting Counsel in an effort to ensure that
2 the work they performed was accomplished effectively and efficiently.
- 3 • Conducted an initial case investigation to develop the theories of liability and the
4 facts that formed the basis of the allegations against Defendants. This research
5 included a review of publicly available information regarding the lithium ion
6 battery (“LIB”) industry, and consultation with industry experts and economists.
- 7 • Drafted four comprehensive consolidated amended complaints detailing
8 Defendants’ alleged violations of the antitrust laws (ECF Nos. 221, 419, 519, and
9 1168).
- 10 • Conducted exhaustive legal research regarding IPPs’ claims and the defenses,
11 particularly with respect to Defendants’ multiple rounds of motions to dismiss, and
12 Toshiba’s motion for summary judgment based on its alleged withdrawal from the
13 conspiracy. IPPs largely prevailed on each motion (ECF Nos. 361, 512, and 1160).
- 14 • Propounded multiple sets of discovery that—after extensive meet and confers and
15 negotiations with Defendants—resulted in the identification of 273 document
16 custodians and the production of more than eight million documents, and
17 voluminous electronic transactional data. Many of these documents were in
18 Japanese and Korean and had to be translated.
- 19 • Organized and oversaw a team of lawyers that reviewed, searched, and extensively
20 coded and analyzed these foreign language documents.
- 21 • Engaged in extensive non-party discovery, including obtaining access to and
22 reviewing 71 datasets concerning the non-parties’ purchases and sales of LIBs and
23 packs and products containing LIBs.
- 24 • Prepared for and took the depositions of a number of merits witnesses, and
25 Defendants’ expert economist.
- 26 • Prepared for and argued at multiple court hearings, including the motions to
27 dismiss, Toshiba’s motion for summary judgment, and IPPs’ motion for class

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certification.

- Retained expert economists and consultants to analyze and review Defendant and non-party data to assist counsel in their investigation and analysis and to prepare expert reports in support of IPPs’ class certification motion. This involved many hours of discussions, research, and analysis.
- Maintained close communication with the class representatives throughout the litigation and answered six sets of discovery propounded by Defendants, including Requests for Production of Documents, Interrogatories and Requests for Admission, and a contention interrogatory concerning Defendants’ concealment of their conspiratorial activities.
- Assisted the class representatives in preparing for their depositions and in collecting responsive documents. This latter task involved extensive consultation with each class representative and their individual counsel and electronic document retrieval for document production.
- Engaged and consulted extensively with experts and economists on issues pertaining to electronic discovery, liability, summary judgment, class certification, and damages throughout the course of the litigation.
- Engaged in extensive settlement discussions with the Settling Defendants.
- Prepared for and briefed Oppositions to Defendants Motions to Dismiss and Toshiba’s Motion for Summary Judgment.
- Prepared for and filed multiple Motions for Class Certification.

16. Plaintiffs have faced significant risk since the inception of this case nearly four

years ago. Plaintiffs have faced:

- the risk of litigating against some of the largest and most sophisticated law firms in the world, all possessing seemingly limitless resources;
- the risk of not being reimbursed for out of pocket litigation costs, such as those involved with translating documents and retaining experts;

- 1 • the risk that the consolidated complaints would not withstand the extensive
- 2 individual and joint motions to dismiss;
- 3 • the risk that Toshiba would prevail on its Motion for Summary Judgment;
- 4 • the risk of not achieving class certification;
- 5 • the risk that even if Plaintiffs were able to obtain a favorable settlement or
- 6 judgment, that the financial condition or bankruptcy of a Defendant would
- 7 materially change or lessen the amount of the settlement;
- 8 • the risk that Defendants would, and in fact have, vehemently contested their
- 9 participation in the alleged conspiracy;
- 10 • the risk of trying an antitrust case, which is considered “notoriously complex,” (*see*
- 11 *Weseley v. Spear, Leeds & Kellogg*, 711 F. Supp. 713, 719 (E.D.N.Y. 1989);
- 12 • the risk that the class would not be certified; and
- 13 • the changing landscape of the law with respect to civil antitrust actions, proving
- 14 damages and class actions cases generally.

15 17. CPM has prosecuted this litigation solely on a contingent-fee basis, and has been at
16 risk that it would not receive any compensation for prosecuting claims against the defendants.
17 While CPM devoted its time and resources to this matter, it has foregone other legal work for
18 which it would have been compensated.

19 **SUMMARY OF EXHIBITS**

20 18. Attached hereto as **Exhibit B** is a billing summary for CPM’s total hours and
21 lodestar, computed at current billing rates, from March 1, 2017, to March 11, 2019. The total
22 number of hours spent by CPM during this period was 2642.60 hours with a corresponding
23 lodestar based on current rates of \$1,204,872.50. The lodestar amount reflected in **Exhibit B** is for
24 work necessary to prosecute this case and was performed by professional staff at my law firm.
25 This summary was prepared from contemporaneous, daily time records regularly prepared and
26 maintained by CPM.

1 19. Attached hereto as **Exhibit C** is a list of the billing rates at which each attorney and
2 staff member at my firm has billed in this case. These reflect prevailing rates for the types of
3 services we provide. These rates are reasonable and fair given CPM's many years of experience in
4 prosecuting antitrust class actions. In addition, our rate structure has been approved by numerous
5 courts. *See, e.g., In re Automotive Parts Antitrust Litigation*, No. 12-md-02311, 13-cv-01503-
6 MOB (E.D. Mich. July 10, 2017), ECF No. 148; *In re Capacitors Antitrust Litigation*, No. 14-cv-
7 03264-JD (N.D. Cal. Oct. 30, 2017), ECF No. 1938; *In re Static Random Access Memory (SRAM)*
8 *Antitrust Litigation*, No. 07-md-01819-CW (N.D. Cal. June 30, 2011), ECF No. 1370; *In re*
9 *Transpacific Passenger Air Transportation Antitrust Litigation*, 07-cv-05634-CRB (N.D. Cal.
10 Sept. 24, 2018), ECF No. 1252.

11 20. Attached hereto as **Exhibit D**, for ease of reference, is the billing summary of work
12 performed by CPM from June 1, 2013, to February 28, 2017, submitted with the Declaration of
13 Steven N. Williams in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys'
14 Fees and Reimbursement of Expenses on Behalf of Cotchett, Pitre & McCarthy, LLP, and filed on
15 May 26, 2017. (ECF No. 1812). Counsel for Plaintiffs did not and do not seek attorneys' fees for
16 any time billed prior to the appointment of Co-Lead Counsel. *See* Order dated May 17, 2013 (ECF
17 No. 198).

18 21. In summary, the total number of hours spent by CPM since June 1, 2013, was
19 20154.30, with a corresponding lodestar based on current rates of \$8,538,041.00.

20 22. Attached hereto as **Exhibit E** is a compilation of my firm's detailed time records at
21 historical billings rates, from March 1, 2017, to March 11, 2019.

22 23. Attached hereto as **Exhibit F** is a summary of the expenses CPM has incurred from
23 June 1, 2013, to present, plus applicable case-filing fees. CPM expended a total of \$71,349.74 in
24 unreimbursed costs and expenses in connection with the prosecution of this case. These expenses
25 were incurred on behalf of IPPs by CPM on a contingent basis and have not been reimbursed. The
26 expenses reflected in **Exhibit F** were prepared from expense vouchers, receipts, and bank records,
27 and therefore represent an accurate recordation of the expenses incurred.

1 24. I have reviewed the time and expenses reported by CPM in this case and included
2 in this declaration, and I affirm that they are true and accurate.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is
4 true and correct.

5 Executed on this 23rd day of April, 2019, at Burlingame, California.

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/s/ Adam J. Zapala

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EXHIBIT A

COTCHETT, PITRE & McCARTHY, LLP

ATTORNEYS AT LAW

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ADVOCATES FOR JUSTICE

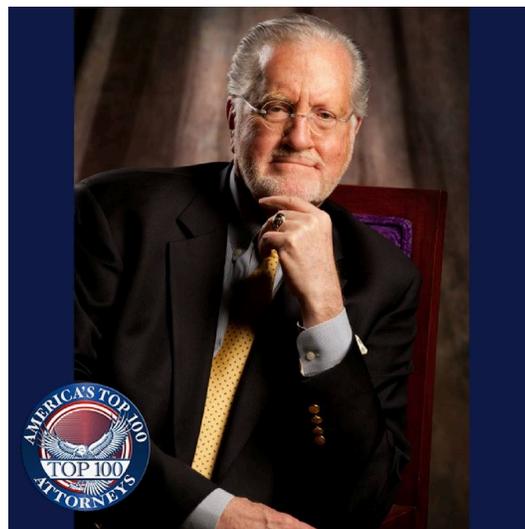


*"The attorneys ... displayed truly exceptional levels of skill and tenacity."
- Judge of the U.S. District Court*

OUR FIRM

Cotchett, Pitre & McCarthy, LLP based on the San Francisco Peninsula for over 45 years, engages exclusively in litigation and trials. The firm's dedication to prosecuting or defending socially just actions has earned it a national reputation. With offices in Burlingame, Los Angeles and New York, the core of the firm is its people and their dedication to principles of law, their work ethic and commitment to justice.

Most clients are referred by other lawyers, who know of the firm's abilities and reputation in the legal community. We are trial lawyers dedicated to achieving justice.



“The Cotchett firm has few peers that equal their ability in litigation. Their commitment to the cause of justice and their ethical standards stand apart. They are people who give back to the community and give lawyers a good name.”
— Judge of the Superior Court (Retired)

PRACTICE AREAS

CPM represents Plaintiffs and Defendants in a wide range of areas, including:

- Antitrust & Global Competition
- Aviation / Helicopter Accidents
- Commercial Litigation
- Consumer Protection Litigation
- Defective Products / Mass Torts
- Elder Abuse
- Employment Law
- Environmental Litigation
- False Claims / Whistleblower Law
- First Amendment Defense
- Intellectual Property
- Municipal & Public Entity Litigation
- Personal Injury & Wrongful Death
- Pharmaceutical Litigation
- Securities / Financial Fraud
- Shareholder Rights / Corporate Governance

“This court has had the distinct pleasure of having the parties in this case represented by some of the finest attorneys not only in this state but in the country.” Cotchett, Pitre & McCarthy has “well reputed experience in [consumer fraud] litigation.”
- Judge of the U.S. District Court

LOCATIONS

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ANTITRUST CASES

In re Auto Parts Antitrust Litigation **USDC, Eastern District of Michigan**

CPM is co-lead counsel on behalf of consumers against suppliers of automotive parts, alleging that defendants engaged in a conspiracy that lasted over a decade to fix the prices of various automotive parts sold to automobile manufacturers, such as Toyota, Honda, and Nissan. The case involves one of the largest conspiracies in history.

CPM has heavily litigated and prevailed on many motions filed by Defendants. CPM manages discovery and document review which entails millions of pages of documents. CPM has also dedicated a significant amount of time and resources to depositions, interviews, proffers, negotiations, and mediations which has led to settlements with several Defendants.

To date, CPM and its two co-lead counsel have secured settlements on behalf of the class in excess of \$1.2 billion.

In re Domestic Airline Travel Antitrust Litigation **USDC, District of Columbia**

CPM and Adam J. Zapala have been appointed Co-Lead Counsel on behalf of Plaintiffs against Defendants American Airlines, Inc., Delta Airlines, Inc., Southwest Airlines Co., and United Airlines, Inc., who are alleged to have conspired to fix, raise, maintain, and/or stabilize prices for air passenger transportation services within the United States, its territories and the District of Columbia in violation of Sections 1 and 3 of the Sherman Antitrust Act (15 U.S.C. §§ 1, 3), by, inter alia, colluding to limit capacity on their respective airlines.

To date, CPM and its co-counsel have secured settlements on behalf of the class in excess of \$60 million.

In re Capacitors Antitrust Litigation **USDC, Northern District of California**

CPM is Lead Counsel and represents indirect purchasers of capacitors against Defendants, the leading manufacturers of capacitors sold in the United States, for allegedly engaging in two massive and separate conspiracies to unlawfully inflate, fix, raise, maintain or artificially stabilize the prices of electrolytic and film capacitors, respectively.

CPM has extensively engaged in discovery, propounding and responding to numerous written discovery requests. CPM has also developed and implemented intricate document review procedures for purposes of defeating motions to dismiss and contesting summary judgment motions on limited time.

To date, CPM has secured settlements with several Defendants on behalf of the class, totaling over \$80.4 million.

In re Resistors Antitrust Litigation
USDC, Northern District of California

The Court appointed CPM as sole Lead Counsel on behalf of a class of indirect purchaser plaintiffs of resistors purchased from defendants who allegedly conspired to unlawfully inflate, fix, raise, maintain or artificially stabilize prices.

To date, CPM and its co-counsel have secured \$33.4 million in settlements on behalf of the class.

In re Lithium Batteries Antitrust Litigation
USDC, Northern District of California

The Court appointed CPM as Co-Lead Counsel on behalf of indirect purchasers of lithium-ion rechargeable batteries who allege that defendants conspired to fix the price of those products. CPM has been extensively involved in the review of millions of pages of documents, the production of Plaintiffs' documents, propounding and responding to discovery, and depositions.

To date, CPM and its co-counsel have secured \$113.45 million in settlements on behalf of the class.

In re Generic Pharmaceuticals Pricing Antitrust Litigation
USDC, Eastern District of Pennsylvania

CPM and Adam J. Zapala have been appointed as a steering committee member in a case brought by indirect purchasers of generic drugs to recoup overcharges that resulted from Defendants' alleged price-fixing conspiracy. On January 9, 2017, two executives of a manufacturer of generic doxycycline pled guilty in federal court in the Eastern District of Pennsylvania to criminal price-fixing, thereby confirming the existence of a conspiracy among manufacturers to fix prices.

In re Broiler Chicken Antitrust Litigation
USDC, Northern District of Illinois

CPM is Co-Lead Counsel and represents commercial and institutional indirect purchasers who allege Defendants implemented and executed a conspiracy to fix, raise, maintain, and stabilize the price of Broilers by coordinating their output and limiting production with the intent and expected result of increasing prices of Broilers in the United States. In furtherance of their conspiracy, Defendants exchanged detailed, competitively sensitive, and closely-guarded non-public information about prices, capacity, sales volume, and demand, including through third party co-conspirator Agri Stats.

In re Transpacific Passenger Air Transportation Antitrust Litigation
USDC, Northern District of California

CPM is Co-Lead counsel for a proposed class of purchasers who allege that they paid fuel surcharges illegally charged by Defendants on long-haul passenger flights for transpacific routes. Throughout the course of this heavily litigated case, Plaintiffs filed a comprehensive consolidated amended complaint detailing Defendants' alleged violations. CPM defended and, on the whole, prevailed after extensive rounds of hard-fought motions to dismiss and for summary judgment, with arguments covering such complex regulatory areas as the filed-rate doctrine, the act of state doctrine, the state action doctrine, implied preclusion, federal preemption and the sufficiency of the conspiracy allegations under *Twombly* and *Iqbal*, amongst several other attacks on the pleadings. CPM has moved for class certification, on which the Court will hear class certification shortly,

To date, CPM and its Co-Counsel have secured settlements with all of the Defendants totaling near \$90.25 million.

In re Qualcomm Antitrust Litigation
USDC, Northern District of California

CPM and Joseph W. Cotchett have been appointed Co-Lead counsel for plaintiffs' who allege that Qualcomm monopolized the market and engaged in other anticompetitive conduct in the market for cellular devices and modem chips.

In re Cathode Ray Tube (CRT) Antitrust Litigation
USDC, Northern District of California

CPM is an Executive Committee Member and represents a class of direct purchaser plaintiffs against manufacturers of cathode ray terminals ("CRT") who allege that the prices were artificially raised, maintained or stabilized at a supra-competitive level by Defendants and their co-conspirators.

In re Optical Disk Drive (ODD) Antitrust Litigation
USDC, Northern District of California

CPM is a member of the executive committee in this multidistrict litigation alleging a conspiracy that manufacturers of optical disk drives ("ODD") fixed prices of ODDs sold directly to Plaintiffs in the United States.

Plaintiffs reached \$74,750,000 in settlements.

In re Static Random Access Memory (SRAM) Antitrust Litigation
USDC, Northern District of California

The Court appointed CPM as sole Lead Counsel for direct purchaser plaintiffs of Static Random Access Memory ("SRAM") chips. Important legal rulings were reached on cutting edge issues such as standing of class representatives and the proper showing for class certification. (Settled, 2011).

CPM successfully secured a \$77 million settlement on behalf of plaintiffs.

In re Dynamic Random Access Memory (DRAM) Antitrust Litigation
USDC, Northern District of California

CPM served as chair of the Discovery Committee in a multidistrict litigation arising from the alleged price-fixing of DRAM, a form of computer memory. Shortly before the scheduled trial, class counsel reached settlements with the last remaining defendants, bringing the total value of the *class settlements to over \$325 million.*

In re Parking Heaters Antitrust Litigation
USDC, Eastern District of New York

CPM serves as Liaison Counsel for indirect purchaser plaintiffs who purchased air and coolant parking heaters aftermarket for commercial vehicles from Defendants.

Freight Forwarders Antitrust Litigation
USDC, Eastern District of New York

CPM is Co-Lead Counsel for purchasers of Freight Forwarding services in the United States and filed a complaint alleging that the major providers of Freight Forwarding conspired to fix the prices of such services in violation of U.S. federal antitrust law (15 U.S.C. § 1).

CPM was instrumental in securing approximately \$400 million in settlements with defendants for the benefit of the class.

In re International Air Transportation Surcharge Antitrust Litigation
USDC, Northern District of California

CPM served as Co-Lead Counsel for a class of purchasers who alleged that they paid fuel surcharges illegally charged by Defendants on long-haul passenger flights for transatlantic routes. (Settled, 2009).

Plaintiffs secured settlements on behalf of the class with Defendants Virgin Atlantic Airways, LTD and British Airways Plc worth approximately \$204 million.

Air Cargo Shipping Services Antitrust Litigation
USDC, Eastern District of New York

CPM, along with co-counsel, was the court-appointed lead counsel for a proposed class of U.S. indirect purchasers of international air freight services. The case alleged that the providers of international air freight services conspired to fix the prices of such services, including fuel surcharges. The case named almost forty international air freight carriers as Defendants. The claims of the United States indirect purchasers were brought under the antitrust laws and consumer protection laws of various U.S. states. The Court granted approval to a settlement with Defendants Deutsche Lufthansa AG, Lufthansa Cargo AG, and Swiss International Air Lines, Ltd. (Settled, 2009).

In re: Plasma Derivative Protein Therapies Antitrust Litigation

USDC, Northern District of California

CPM was lead counsel for indirect purchasers in this antitrust class action alleging price-fixing in the market for the life-saving blood products albumin and immunoglobulin.

Webkinz Litigation, Nuts for Candy v. Ganz Inc., et al.

USDC, Northern District of California

CPM was lead counsel representing a proposed class of persons or entities in the United States who ordered Webkinz from Ganz Inc. on the condition that they also order products from Ganz's "core line" of products. The complaint alleged that Ganz conditioned the purchase of its popular Webkinz plush line toy with a minimum \$1,000 purchase of non-Webkinz "core" line products in violation of federal antitrust laws. On September 17, 2012, Hon. Richard Seeborg of the Northern District of California approved a class action settlement on behalf of a class of small business retailers against Ganz Inc. for alleged antitrust violations where customers were required to purchase unwanted products as a condition to purchasing Ganz's popular Webkinz Toy. (Settled, 2012).

Municipal Derivative Investment Antitrust Litigation

USDC, Southern District of New York

Along with co-counsel, CPM represents Los Angeles and numerous public entities who purchased Guaranteed Investment Contracts ("GICs") and other derivative investments. GICs and derivative investments are purchased from financial institutions, insurance companies, and others through a competitive bidding process overseen by brokers. They are purchased when public entities issue tax-exempt municipal bonds to raise funds to finance public works projects and have funds that are not immediately needed for the project. CPM's investigation has uncovered, and the complaints allege, that the competitive bidding process is a sham as securities sellers and brokers in the derivative investment market have engaged in a conspiracy to allocate the market and rig the bidding process in violation of antitrust law and common law.

Toyota Motor Sales USA, Inc.

Livingston v. Toyota Motor Sales USA, Inc.

USDC, Northern District of California

CPM filed an antitrust class action under Sherman Act by purchasers of Toyota vehicles for secret rebates. (Settled, 1997).

Hip and Knee Implant Marketing Litigation

USDC, Northern District of California

CPM, with co-counsel, filed two complaints on behalf of a proposed classes of persons who underwent hip or knee implant surgery. The complaints allege that the major manufacturers of hip and knee implants have engaged in a pervasive kickback scheme, using phony consulting

agreements with orthopedic surgeons, to improperly funnel money to doctors and hospitals in return for choosing the manufacturer's device during surgeries. This scheme artificially raised the costs of hip or knee implants paid for by members of the proposed class in violation of state antitrust and consumer protection laws.

***In re Commercial Tissue Products Public Entity
Indirect Purchaser Antitrust Litigation
County of San Mateo v. Kimberly-Clark Corp.
San Francisco County Superior Court***

CPM filed an antitrust class action on behalf of class of public entity consumers of commercial sanitary paper products against alleged price-fixing conspiracy among producers. (Appointed co-lead counsel for public entity class, 1998).

***Dry Creek Corporation v. El Paso Corporation
San Diego County Superior Court***

CPM filed an antitrust action against El Paso for allegedly withholding natural gas from California in order to drive up prices, which was successfully resolved on behalf of the Plaintiff.

***In re Hydrogen Peroxide Antitrust Litigation
USDC, Eastern District of Pennsylvania***

CPM filed an antitrust class action for conspiracy to fix prices of hydrogen peroxide manufactured and sold by Defendants who were engaged in an alleged price-fixing conspiracy.

***Kopies, Inc., et al. v. Eastman Kodak Co.
USDC, Northern District of California***

CPM was appointed Co-Lead counsel, and successfully prosecuted an antitrust class action on behalf of copier service firms against parts manufacturers for alleged illegal tying of products and services.

CPM successfully reached a \$45 million settlement with Kodak on behalf of plaintiffs.

***E&J Gallo Winery v. EnCana Energy Services, et al.
USDC, Eastern District of California***

CPM successfully represented E. & J. Gallo Winery in an antitrust action against natural gas companies for allegedly manipulating energy prices, which led to the 2000-2001 California energy crisis, in which energy companies not only gouged the State of California and its residents of billions of dollars but caused rolling blackouts throughout California. E. & J. Gallo Winery is one of the largest natural gas users in the State of California and it suffered millions of dollars in losses. CPM's aggressive prosecution of this case resulted in the case settling on the eve of. CPM's efforts led to the landmark Ninth Circuit opinion on the filed rate doctrine. *E. & J. Gallo Winery v. EnCana Corporation*, 503 F.3d 1027 (9th Cir. 2007).

National Gas Anti-Trust Cases I, II, III, & IV
San Diego Superior Court

CPM represented eleven public entities and others for the alleged reporting of false information by non-core natural gas retailers to published price indices to manipulate the natural gas market during the California energy crisis.

CPM successfully prosecuted this case, concluding in approximately \$124 Million in settlements.

Bathroom Fittings Cases
USDC, Northern District of California

CPM was a member of the Executive Committee in an antitrust class action alleging a conspiracy to fix prices of Bathroom Fittings manufactured by Defendants participating in an alleged price-fixing conspiracy.

Magazine Paper
San Francisco County Superior Court

CPM filed an antitrust class action alleging a price-fixing conspiracy against magazine paper products International Paper Co., MeadWestvaco Corporation, Norske Skog, Stora Enso, Sappi Limited, S.D. Warren Company and others.

Foundry Resins
USDC, Southern District of Ohio

CPM filed an antitrust class action alleging a conspiracy to fix prices of resins manufactured by Ashland Inc., Ashland Specialty Chemical Company, Borden Chemical Inc., Delta HA, Inc., HA International LLC.

In re Automotive Refinishing Paint Cases
Alameda County Superior Court

CPM was appointed Co-Liaison Counsel in an antitrust class action for conspiracy to fix the price of auto paint by manufacturers engaged in an alleged price-fixing conspiracy. The class was certified in 2004.

In re Methionine Antitrust Litigation
USDC, Northern District of California

CPM was appointed Co-Lead Counsel in this antitrust class action against several methionine manufacturers involved in an alleged conspiracy to fix the prices of and allocate the markets for methionine.

This case settled for \$107 million.

In re Citric Acid Antitrust Litigation
USDC, Northern District of California

CPM served as Co-Lead Counsel in an antitrust class action against the five largest sellers of citric acid in the United States, who are alleged to have conspired to raise and fix the price of citric acid at artificially high levels. Co -Lead counsel successfully certified the class in October 1996. ***Co-Lead Counsel also reached approximately \$86.5 million in combined settlements with defendants*** Archer Daniels Midland Co., Hoffmann-La Roche Inc., Jungbunzlauer, Inc., Haarmann & Reimer Corp., and Cerestar Bioproducts B.V.

In re Beer Antitrust Litigation
USDC, Northern District of California

CPM was appointed Co-Lead counsel in an antitrust class action on behalf of specialty beer brewers against Anheuser-Busch, Inc. for allegedly attempting to monopolize the U.S. beer industry by denying access to distribution channels.

In re Sodium Gluconate Antitrust Litigation
USDC, Northern District of California

CPM served as Lead Counsel in an antitrust class action against Defendants who allegedly price fixed sodium gluconate, and industrial cleaning agent.

CPM successfully certified the class, and reached a settlement on behalf class plaintiffs in the amount of \$4,801,600.

OUR PEOPLE

ANTITRUST ATTORNEYS AT CPM

PARTNERS

JOSEPH W. COTCHETT



ADMISSIONS

- California
- New York
- District of Columbia
- U.S. Supreme Court
- California Court of Appeals
- 9th Circuit Court of Appeals
- 3rd Circuit Court of Appeals
- 5th Circuit Court of Appeals

EDUCATION

- Hastings College of Law at the University of California, J.D.
- California State Polytechnic University, B.S. in Engineering

As stated by the National Law Journal, Joseph W. Cotchett is considered by plaintiffs and defense attorneys alike to be one of the foremost trial lawyers in the country. He has been named one of the 100 most influential lawyers in the nation for the past 15 years.

As reported in the *San Francisco / Los Angeles Daily Journal*, he is “considered one of the best trial strategists in the state” who built a career out of representing the underdog against powerful interests. He is a fearless litigator and once tried two cases at the same time (one in the morning and one in the afternoon) and won them both in San Diego Superior Court in 1984. His clients range from corporate giants to groups like Consumers Union of United States, Inc. In 2003, the *San Francisco Chronicle* said “[t]he *Burlingame* attorney has had a star career that’s not only talked about in legal circles but has made headlines around the country. Known mostly as a plaintiffs’ lawyer, many of his cases are filed on behalf of fraud victims, and have a widows-and-orphan flavor to them.” Cotchett consistently has been named one of the most

influential lawyers in California, and has been named by the legal press as one of the top 10 trial attorneys in the state and has been listed in every edition of Best Lawyers in America since its inception.

During his 45-plus year legal career, he has tried more than 100 cases to verdict, and settled hundreds more, winning numerous jury verdicts, ranging from multi-million dollar malicious prosecution jury verdicts to several defense verdicts in complex civil cases. He successfully negotiated a multi-million dollar settlement in a qui tam suit on behalf of the University of California and hundreds of millions of dollars in antitrust, securities and major fraud cases.

In the 1980s, Cotchett won mammoth judgments and settlements for investors in white-collar fraud cases, with jury verdicts of more than \$200 million arising out of the collapse of the Technical Equities Corp. in San Jose. He is known nationally as the lead trial lawyer for 23,000 plaintiffs in the Lincoln Savings & Loan Association/American Continental Corp. downfall in 1990 involving Charles Keating and others. He won one of the then largest jury verdicts, \$3.3 billion. He obtained nearly \$300 million in settlements from lawyers, accountants and other professionals caught up in the scandal in a jury trial in Tucson, Arizona.

He has represented both the National Football League and teams since the early 1980s in various legal actions. As counsel for E. & J. Gallo Winery, he won a defense jury verdict in a celebrated trade dress infringement case involving a wine produced by Gallo and the firm regularly represents Gallo in numerous matters.

In recent years, Cotchett has taken on major corporate entities and Wall Street. He and the firm were involved in litigation resulting from nearly every major corporate scandal including Enron, Worldcom, Global Crossing, Homestore.com, Qwest, Montana Power Company, Lehman, Bank of America, Goldman Sachs, Lehman Brothers and numerous others on behalf of private investors and public pensions. The firm has represented the California Public Employees' Retirement System, California State Teachers' Retirement System, and the University Of California Board Of Regents, along with numerous political subdivisions of the state, such as counties, cities and districts.

In 2000, he served as trial counsel for Consumers Union, successfully defending the watchdog consumer group in a product disparagement and defamation suit. Isuzu Motors of Japan had sued Consumers Union for disparagement of the 1995-96 Trooper, claiming millions in damages. Following an eight-week trial, a jury ruled in favor of Consumers Union. Trial Lawyers for Public Justice honored Cotchett as "Trial Lawyer of the Year Finalist" in 2000 in honor of his "outstanding contribution to the public interest" through his work for Consumers Union. Also in 2000, Consumer Attorneys of California gave Cotchett its "Presidential Award of Merit"

In 2002, Cotchett successfully represented the Chief Justice of the California Supreme Court and the individual judges and members of the Judicial Council, in litigation brought

against them by the New York Stock Exchange and the National Association of Securities Dealers. The two Wall Street forces had filed suit against the Judicial Council challenging the State of California for establishing guidelines for arbitrators who hear complaints from investors in the state.

Cotchett received his B.S. in Engineering from California State Polytechnic University, San Luis Obispo in June 1960, being named an Outstanding Graduate, and his J.D. from Hastings College of Law at the University of California in June 1964. In June 2002, Cotchett received an Honorary Doctor of Laws from Cal Poly and The California State University Board of Trustees. In May 2006, Cotchett received an Honorary Doctor of Letters from Notre Dame de Namur University. In May 2011, Cotchett received an Honorary Doctor of Letters from the University of San Francisco. In each case, he was the graduation speaker honored by the universities.

Following California Polytech, he served in the U.S. Army Intelligence Corps, followed by years as a Special Forces paratrooper and JAG Corps officer, in the active reserves, and retired in 1991 with the rank of Colonel. He is a member of many veteran and airborne associations having served on active duty 1960-1961. From 2001 to 2005, he served on the board of the Army War College Foundation in Carlisle, Pennsylvania. The Foundation supports the prestigious Army War College at Carlisle Barracks, the graduate school for the senior commanders of all branches of the service, including officers from foreign allies.

He has been an active member of national, state and local bar associations, including the California, New York and District of Columbia bars. He is a Fellow of the prestigious American College of Trial Lawyers and The International Society of Barristers and an Advocate in the American Board of Trial Advocates. He also is a Fellow and former board member of The International Academy of Trial Lawyers. A former Master of the American Inns of Court, he serves on various advisory boards for professional organizations.

He also has served on the Advisory Board of the Witkin Institute, the mission of which is to further B.E. Witkin's commitment to advancing the understanding of California law and improving the administration of justice.

He is the author of numerous articles and a contributing author to numerous magazines. His books include California Products Liability Actions, Matthew Bender; California Courtroom Evidence, LexisNexis; Federal Courtroom Evidence, LexisNexis; Persuasive Opening Statements and Closing Arguments, California Continuing Education of the Bar (1988); The Ethics Gap, Parker & Son Publications (1991); California Courtroom Evidence Foundations, Parker Publications (1993); and numerous law review articles. He is a prolific author of op-ed pieces and articles on public policy, environmental issues and public integrity. In 2002, he co-authored and published the book The Coast Time Forgot, a historic guide to the San Mateo County coast.

Cotchett serves on the Federal Judicial Advisory Committee that submits and reviews federal judicial nominations in California to President Obama. The committee was authorized by the Obama Administration and California's two Democratic senators, Dianne Feinstein and Barbara Boxer. Cotchett is Chair of the Boxer Committee for the Central District of California (Los Angeles) and advises statewide. Cotchett also serves on a Judicial Advisory Committee to Governor Jerry Brown on state judicial appointments.

Cotchett has lectured at numerous law schools including Harvard Law School, the University of Southern California, Georgetown Law Center, Stanford, Boalt, and his alma mater U.C. Hastings. His subjects include complex cases, evidence, trial practice and professional ethics. He also is a keynote public speaker and lecturer on contemporary subjects of law.

He has been honored by the State Bar of California by serving on the Board of Governors from 1972 to 1975. Cotchett served on the California Judicial Council from 1976 to 1980; the Board of Directors, Hastings College of Law, University of California for twelve years; California Commission on the Future of the Courts; the California Select Committee on Judicial Retirement, the California Blue Ribbon Commission on Children in Foster Care, the latter three appointed by the Chief Justice of California.

His civic work includes past memberships on the board of directors of the San Mateo County Heart Association; San Mateo Boys & Girls Club (Past President); Peninsula Association of Retarded Children and Adults; Bay Meadows Foundation; Disability Rights Advocates; and numerous Bay Area organizations. He formerly served as a member of the board of Public Citizen in Washington, D.C. and served on the board of Earth Justice.

In 1996, he was awarded the Anti-Defamation League's Distinguished Jurisprudence Award. The award was established to recognize individuals in the legal community who have exhibited humanitarian concerns, and whose everyday actions exemplify the principals on which the Anti-Defamation League was founded.

In 1999, Cotchett was inducted by the State Bar of California to the Litigation Trial Lawyers Hall of Fame. This award is given to professionals who have excelled as trial lawyers and whose careers exemplify the highest values and professional accomplishment.

In 2000, the University of California Hastings College of Law opened the Cotchett Center for Advocacy recognizing Cotchett as one of its outstanding graduates. Chief Justice Ronald M. George of the California Supreme Court and Associate Justice Anthony Kennedy of the U.S. Supreme Court honored Cotchett as speakers at the Founder's Day dedication of the center. In November of 2006, Notre Dame de Namur University in Belmont, California dedicated the Joseph W. Cotchett Business Lab for students.

In March of 2000, Cotchett was named to the California State Parks Commission by Governor Gray Davis. The commission establishes general policies for the guidance of the Parks

Department in the administration, protection and development of the 260 state parks in the system. He served as Chairperson in 2002-2003.

In 2003, Cotchett was honored by Disability Rights Advocates for his nearly 40 years of civil rights work. At a San Francisco dinner in October attended by lawyers, judges and community leaders, this was how Cotchett was described:

Joe Cotchett has been a champion for justice since his college days. As an engineering student in North Carolina, Joe challenged segregation by drinking from segregated water fountains and riding in the back of buses. Later, as a student at Cal Poly, in 1958 Joe successfully established the first integrated fraternity, which prompted the other fraternities on campus to follow suit. Joe's legal career has involved representing the underdog and doing extensive pro bono work. His civil rights commitment has been leveraged over and over by his financial support of legal fellowships. He has given a 'kick-start' to the public interest careers of the new law graduates at Trial Lawyers for Public Justice, Public Citizen, Southern Poverty Law Center and Disability Rights Advocates. Through these fellowships, Joe has helped to ensure social change through law. Joe guided DRA as a board and litigation committee member from its infancy years into the defender of disability rights it has become today.

In 2004, continuing a distinguished history of community and civic involvement, Cotchett endowed a \$7 million fund to support science and mathematics teacher education at California State Polytechnic University to serve inner city and rural minority children. To honor Cotchett, the university renamed its landmark Clock Tower building the "Cotchett Education Building." The gift supports science and mathematics teacher education initiatives at Cal Poly through the University Center of Teacher Education and the College of Science and Mathematics.

In 2011, Cotchett was inducted into the prestigious American Trial Lawyer Hall of Fame for his work nationwide in civil rights, and litigation on behalf of the under-privileged in our society. In 2011, he received the Distinguished Service Award from the Judicial Council of California and was named the Antitrust Lawyer of the Year by the State Bar. In April of 2011, he was honored by the California League of Conservation Voters with the Environmental Leadership Award and honored by the Consumer Watchdog with the Lifetime Achievement Award.

Cotchett and his family members are active in numerous Bay Area charitable organizations involving animals, children, women and minorities. They established the Cotchett Family Foundation that aids individuals and groups in need of assistance.

ADAM J. ZAPALA



ADMISSIONS

- California
- Michigan
- 9th Circuit Court of Appeals

EDUCATION

- University of California, Hastings College of the Law, J.D.
- Stanford University, B.A.

HONORS & AWARDS

- Northern California Super Lawyers, Rising Stars List (2014 – 2018)

Adam J. Zapala focuses his practice on antitrust, false claims act litigation, consumer protection and class actions. Mr. Zapala received a B.A. from Stanford University and his J.D. from University of California, Hastings College of the Law. While at Hastings, Mr. Zapala received awards for best moot court brief, the Pro Bono Publico award, most outstanding student in Group Advocacy and Systemic Reform, and Excellence for the Future Award in Pre-trial Practice.

While at CPM, Mr. Zapala has served in leadership positions on the following major antitrust and complex matters, among others:

- *Precision Associates et al. v. Panalpina World Transport et. al.*, No. 08-CV-00042-JG-VVP (E.D. N.Y.) (recovering over \$400 million on behalf of plaintiffs' class);
- *In re Automotive Parts Antitrust Litigation*, No. 12-md-02311 (E.D. Mich.) (to date, recovering over \$600 million on behalf of indirect purchasers);
- *In re Transpacific Air Passenger Transportation Antitrust Litigation*, No. 07-CV-5634-CRB, MDL 1913 (N.D. Cal.) (ongoing case recovering over \$40 million on behalf of plaintiffs' class);
- *In re Capacitors Antitrust Litigation*, Case No. 3:14-cv-03264 (N.D. Cal.) (ongoing case where indirect purchasers have recovered over \$30 million to date);
- *In re Resistors Antitrust Litigation*, No. 15-cv-03820-JD (N.D. Cal.) (ongoing case);

- *In re Vizio, Inc. Consumer Privacy Litigation*, No. 16-md-02693-JLS (C.D. Cal.) (cutting edge privacy litigation on behalf of plaintiffs' class).

Previously, Mr. Zapala worked at a prominent San Francisco firm, where he represented labor unions, Taft-Hartley Pension and Health & Welfare funds, employees and consumers in complex litigation, arbitration and NLRB proceedings. While at this firm, Mr. Zapala served as trial counsel in countless matters on behalf of labor unions and employee benefit funds. He has argued cases before the California First, Third, and Sixth District Court of Appeal. Mr. Zapala also previously served as a staff attorney with Bay Area Legal Aid, where he focused on representing indigent clients in a wide variety of civil litigation matters. While there, Mr. Zapala developed expertise in Medi-Cal, Medicare and other publicly-financed healthcare systems. While in law school, Mr. Zapala also worked for the public interest law firms of Public Advocates, Inc. and Public Justice, focusing on civil rights class action litigation.

Mr. Zapala also has legislative and policy experience, working on Capitol Hill as a policy aide for Senator Ron Wyden (D-Oregon) in Washington D.C. Mr. Zapala has deep ties to the Bay Area. He grew up in San Jose, California and attended Bellarmine College Preparatory. While at Stanford University, Mr. Zapala became a four-time Academic All-American, a four-time All-American, and Captain of the Stanford Men's Soccer Team. In 2001, he was drafted in the Major League Soccer ("MLS") Super Draft by the Dallas Burn (now FC Dallas).

ELIZABETH T. CASTILLO



ADMISSIONS

- California
- Michigan
- 9th Circuit Court of Appeals
- 6th Circuit Court of Appeals

EDUCATION

- University of California Hastings College of the Law, J.D.
- Boston University, B.A., Economics and Political Science

HONORS & AWARDS

- American Antitrust Institute 2016 Outstanding Antitrust Litigation Achievement by a Young Lawyer Award
- Super Lawyers Northern California Rising Stars List (2015 - 2018)

Elizabeth (Tran) Castillo joined Cotchett, Pitre & McCarthy, LLP (CPM) in 2012 and is a Principal on the Antitrust & Global Competition Team. Her practice focuses on complex litigation—specifically, antitrust class actions against international cartels. Ms. Castillo is the lead associate at CPM on *In re Automotive Parts Antitrust Litigation (Auto Parts)*, a multidistrict litigation pending in the Eastern District of Michigan. Auto Parts concerns the bid-rigging and price-fixing of scores of automotive parts and has become the largest indirect purchaser class action in terms of settlement value in history. Ms. Castillo received the American Antitrust Institute’s 2016 Outstanding Antitrust Litigation Achievement by a Young Lawyer Award for her work in Auto Parts.

Ms. Castillo earned her J.D. from the University of California, Hastings College of the Law (UC Hastings) in 2011. At UC Hastings, she was a Super Regional Semifinalist in the Jessup International Law Moot Court Competition. She also received Honorable Mentions for both Best Brief and Best Oral Argument in Moot Court. Additionally, she served as a Judicial Extern to the Honorable A. James Robertson II in the Superior County of California, County of San Francisco, and as a Teaching Assistant for both Legal Writing & Research and Moot Court. Throughout law school, Ms. Castillo mentored underserved high school students on preparing for college.

Ms. Castillo received her B.A. in Economics and Political Science, with a concentration in Public Policy, from Boston University (BU) in 2008. At BU, she interned at an international law firm and business advocacy organization in London and Sydney, respectively, during her junior year. Ms. Castillo has national and state legislative experience. She interned for then-U.S.

Representative Neil Abercrombie (D-Hawaii, 1991-2010; Governor of Hawaii, 2010-2014) in Washington, D.C. and State Representative Scott Nishimoto (D-Hawaii, 2003-present) in Honolulu.

SENIOR ASSOCIATES

ALEXANDER E. BARNETT



ADMISSIONS

- New York
- District of Columbia
- 2nd Circuit Court of Appeals

EDUCATION

- St. John's University School of Law, J.D.
- University of Pennsylvania, B.A.

Alex Barnett specializes in class actions involving antitrust and securities law violations, consumer fraud, negligent product design and manufacture, wage and overtime disputes, civil rights violations, and violation of environmental laws. He also handles mass tort litigation.

Representative class action cases include: *Turner v. General Electric Company*, No. 2:05-CV-186-FtM-33DNF (M.D. Fla.) (claims by purchasers of allegedly defective General Electric refrigerators); *Staton v. IMI South, LLC*, No. 03-CI-588 (Ky. Cir. Ct.) (claims by purchasers of defective concrete for repair of home foundations and flatwork); *In re Bridgestone/Firestone Inc., ATX, ATX II and Wilderness Tires*, MDL No. 1373 (S.D. Ind.) (claims by purchasers of allegedly defective tires), *Gori v. Merck & Co., Inc.*, No.: 04L1254 (claims by purchasers of Vioxx for refund of purchase price); and *Harman v. Lipari* (claims for medical monitoring for residents of neighborhood bordering a Superfund site in New Jersey). Mr. Barnett also has represented individuals injured by pharmaceutical products such as Redux and Pondimin, Baycol, Serzone, and Vioxx. In addition, Mr. Barnett served as counsel for the cities of Boston, Los Angeles, Philadelphia and San Francisco against the handgun industry and as counsel for the City of Milwaukee in a case against the lead pigment industry. Mr. Barnett has served as a lecturer on class actions, serving as a Panel speaker at the First Annual National Class Actions Symposium (Osgoode Hall Law School, Toronto, Canada) and the Third Annual Class Actions for Non-Class-Action Lawyers - Growing Your Business by Understanding the Basics and Recognizing Opportunities.

Prior to entering private practice, Mr. Barnett served as the Executive Director of the International Association of Jewish Lawyers and Jurists (“IAJLJ”), American Section, an organization dedicated to promoting human rights and the rule of law. Before his tenure at the IAJLJ, Mr. Barnett served as the Democratic Party nominee for the New York State Assembly in New York’s 17th Assembly District.

ADAM J. TROTT



ADMISSIONS

- California

EDUCATION

- U.C. Berkeley School of Law (Boalt Hall), J.D.
- University of California, Los Angeles, B.A.

Adam Trott joined Cotchett, Pitre & McCarthy in 2018 as a Senior Associate focused on complex antitrust and securities litigation. Representative cases include *In re Domestic Air Travel* and *In re Broiler Chicken Antitrust Litigation*.

Mr. Trott received his J.D. from the U.C. Berkeley School of Law (Boalt Hall). While at Berkeley, he served as managing editor of the Berkeley Journal of International Law and published an article in Berkeley's legal journal dedicated to environmental law, Ecology Law Quarterly. During his final year, Mr. Trott interned at the U.S. Department of the Treasury's general counsel's office in Washington, D.C., where he provided advice on CFIUS enforcement and various international monetary and fiscal matters.

After receiving his J.D., Mr. Trott served as Legal and Policy Consultant for the United Nations Global Compact, the world's largest corporate social responsibility initiative, in New York City. While there, Mr. Trott spearheaded the creation of a new reporting framework encouraging businesses around the world to improve their own human and labor rights practices, and those of their supply chains, and worked directly with businesses in Eastern Europe, Africa and Central Asia facing local and cross-border corruption issues. Mr. Trott was a panelist at multiple seminars centered on these issues with business and political leaders and spoke at several related conferences in Europe and North America.

Mr. Trott then moved to San Francisco to join a large law firm, representing clients in antitrust, data privacy, and securities litigation, and Foreign Corrupt Practices Act matters. He also represented several pro bono clients seeking asylum in the United States. Prior to joining Cotchett, Pitre & McCarthy, Mr. Trott volunteered at and worked as an attorney for Disability Rights California, where he represented and provided advocacy services for its clients.

Mr. Trott received his B.A., summa cum laude with College Honors, in Classical Studies and History from the University of California, Los Angeles. While at UCLA, Mr. Trott was heavily involved with the school's music department and marching band, focusing on clarinet performance, and interned for then- and current U.S. Representative Brad Sherman.

ASSOCIATES

MARK F. RAM



ADMISSIONS

- California

EDUCATION

- University of California, Hastings College of the Law, J.D., magna cum laude
- Haverford College, B.A.

HONORS & AWARDS

- CALI/Witkin Award for Excellence in Complex Litigation
- Moot Court Best Oral Argument Award

Mark Ram is an Associate at Cotchett, Pitre & McCarthy, LLP, where he focuses his practice on antitrust law and complex litigation.

Mr. Ram received his B.A. from Haverford College and his J.D. from the University of California, Hastings College of the Law. At Hastings, Mr. Ram served as an editor for the Hastings Law Journal and was a teaching assistant for legal writing and research. He received awards for best moot court oral argument and best performance in Complex Litigation.

Following law school, Mr. Ram had the unique opportunity to clerk for two judges in the San Francisco Superior Court's Complex Litigation Department, Hon. Mary E. Wiss and Hon. John E. Munter (Ret.). Prior to joining Cotchett, Pitre & McCarthy, LLP, Mr. Ram practiced with a national firm in San Francisco focusing on class actions and products liability cases.

TAMARAH P. PREVOST



ADMISSIONS

- California

EDUCATION

- Santa Clara University School of Law, J.D.
- Simon Fraser University, B.A.

Tamarah Prevost is an Associate at Cotchett, Pitre & McCarthy, LLP, practicing in a wide range of civil litigation areas including antitrust, consumer protection, employment law, elder abuse, false claims act litigation, and other complex civil matters.

Ms. Prevost received her J.D. from Santa Clara University School of Law. While at Santa Clara, Ms. Prevost was involved in a variety of extracurricular activities. She was named the Best Oral Advocate in the Semi Final Round of Santa Clara Law's Honors Moot Court Competition, and was published in the Santa Clara Journal of International Law. She received the CALI Award for her "Leadership for Lawyers" class and maintained a heavy involvement in the Women and Law Association, which included her planning a fundraiser to benefit victims of domestic violence. Ms. Prevost also served as a Judicial Extern for the Honorable Justice Nathan Mihara of the Sixth District Court of Appeal, California.

Prior to law school, Ms. Prevost lived in Vancouver, British Columbia, and while there, obtained her Bachelor of Arts degree with First Class Honors from Simon Fraser University. She took a semester off during this time to live in Puerto Viejo, Costa Rica and volunteer at a non-profit organization committed to alleviating poverty for the indigenous population. While living in Vancouver, Ms. Prevost was also actively involved in the Rotary Club of New Westminster.

Ms. Prevost is also involved in community activities, where she is Board of Directors – Director of Governance: Digital Moose Lounge, a non-profit organization that serves as the first point of contact for Canadians new to the Bay Area.

MICHAEL A. MONTAÑO



ADMISSIONS

- California
- Texas

EDUCATION

- Stanford Law School, J.D.
- Yale University, B.A.

HONORS & AWARDS

- Truman National Security Project Political Partner 2017-Present
- New Leaders Council Fellow 2015
- Stanford Law School Public Interest Fellow 2007
- Academy for Educational Development New Voices Fellow 2004
- Yale College Richter Fellow 2002

Michael Montaña's practice focuses on antitrust and privacy law. Representative cases include *In Re Qualcomm Litigation* and *Nuts for Candy v. Visa*.

Michael graduated from the Stanford Law School with Pro Bono Distinction. While at Stanford, Michael served on the executive board of the Stanford Law Review, leading the prestigious journal's push into collaborative online publishing. Michael also served as an editor of the Stanford Law and Policy Review, founded the Voting Rights Project at Stanford Law School, and co-founded the American Constitution Society's first national podcast.

Michael's scholarship in the fields of statutory interpretation and the legislative process, supervised by former Stanford Law School Professor and now California Supreme Court Justice Mariano-Florentino Cuellar, has been published in the Stanford Law Review. Michael's other academic experience includes serving as a Teaching Assistant in Stanford's leading interdisciplinary Program in Science, Technology, and Society.

Prior to joining CPM, Michael was a startup attorney, executive, and advisor, with a focus on legal and civic tech. He has also taken an active role in policy and politics, including as a policy advisor to then-Mayor Julian Castro of San Antonio and as a law clerk to the U.S. House of Representatives Committee on the Judiciary.

Prior to law school, Michael worked at a local non-profit to make capitalism work for the poor through micro-lending and other entrepreneurship-focused programs. A ninth-generation Texan, Michael has deep roots in San Antonio, where he attended Central Catholic High School.

Michael is a member of the American Bar Association, the American Constitution Society for Law and Policy, the American Philosophical Association, and the Truman National Security Project.

EXHIBIT B

Firm Name: Cotchett, Pitre & McCarthy, LLP

Reporting Period: March 1, 2017 - March 11, 2019

Categories:

- (1) Investigations, Factual Research
- (2) Drafting Discovery Requests
- (3) Drafting Discovery Answers/Responses
- (4) Deposition Taking
- (5) Deposition Defending
- (6) Discovery Meet & Confer
- (7) Document Review

- (8) Drafting Pleadings, Briefs & Pretrial Motions
- (9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
- (10) Class Certification/Experts
- (11) Litigation Strategy, Analysis & Case Management
- (12) Negotiating Settlements
- (13) Trial and Trial Preparation
- (14) Court Appearance and Prep

- (P) Partner
- (A) Associate
- (LC) Law Clerk
- (PL) Paralegal

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	LODESTAR
Cotchett, Joseph W. (P)											4.50				4.50	\$950.00	\$ 4,275.00
Williams, Steve N. (P)	1.30							27.80	0.50	7.30	4.80	33.30	1.00	3.50	79.50	\$850.00	\$ 67,575.00
Damrell, Frank C. (P)															0.00	\$775.00	\$ -
Zapala, Adam J. (P)	0.80			62.00		3.30		141.70		1.00	7.00	16.70	2.70	20.90	256.10	\$750.00	\$ 192,075.00
Fineman, Nancy L. (P)															0.00	\$700.00	\$ -
Castillo, Elizabeth T. (P)							0.20	0.20							0.40	\$650.00	\$ 260.00
Barnett, Alexander E. (A)															0.00	\$600.00	\$ -
Lambrinos, Demetrius (A)				22.40		51.80		57.20		50.00	0.60	17.00		0.80	199.80	\$600.00	\$ 119,880.00
Shapiro, Adam (A)	2.00	1.40		2.00	33.30	1.00	1.50	62.90	0.30	17.10	4.30	7.60			133.40	\$600.00	\$ 80,040.00
Trott, Adam (A)								42.90							42.90	\$600.00	\$ 25,740.00
Ram, Mark (A)	0.40							85.00		0.30		1.00			86.70	\$425.00	\$ 36,847.50
Prevost, Tamarah (A)	0.90					8.50		57.60	3.40	5.10	9.10	10.60	2.80	2.10	100.10	\$425.00	\$ 42,542.50
Chang, Joyce (A)	0.80					2.30		17.80			1.40			9.20	31.50	\$425.00	\$ 13,387.50
Lee, Tracy (A)							1216.00								1216.00	\$400.00	\$ 486,400.00
Nishimura, Chikako (A.)							6.50								6.50	\$400.00	\$ 2,600.00
Nozaki, Shinichi (A.)															0.00	\$400.00	\$ -
Shima, Yuri (A)															0.00	\$400.00	\$ -
Hwang, Jessica. (A)															0.00	\$360.00	\$ -
LiCalsi, Joanna W. (A)															0.00	\$360.00	\$ -
Payne, Bryan M. (A.)															0.00	\$360.00	\$ -
Ross, Trevor (A)															0.00	\$360.00	\$ -
Wilkinson, Sean (A)															0.00	\$360.00	\$ -
Shannon, Gerard (A) (English Review Capped at \$350)															0.00	\$350.00	\$ -
SUB-TOTAL	6.20	1.40	0.00	86.40	33.30	66.90	1224.20	493.10	4.20	80.80	31.70	86.20	6.50	36.50	2157.40		\$ 1,071,622.50
NON-ATTORNEYS																	
Verducci, Jaelyn (PL)	1.80			0.20				1.80	1.80		0.20				5.80	\$325.00	\$ 1,885.00
Concepcion, Latoya (PL)															0.00	\$325.00	\$ -
Caylao, Michael (PL)	11.10	47.10	4.20	9.80		1.00	125.00	184.40	56.00	1.20	7.10	10.40	0.90	7.60	465.80	\$275.00	\$ 128,095.00
Blehm, Morgan (PL)														3.70	3.70	\$275.00	\$ 1,017.50
Cox, Allison (PL)														1.20	1.20	\$275.00	\$ 330.00
Doe, Brian (PL)															0.00	\$250.00	\$ -
Engineer, Nirav (PL)															0.00	\$250.00	\$ -
Menzel, Patrick (PL)															0.00	\$250.00	\$ -
Goldwyn, Priya (PL)															0.00	\$250.00	\$ -
Gaa, Reid (PL)								8.00							8.00	\$225.00	\$ 1,800.00
Garcia, Lasha (PL)															0.00	\$225.00	\$ -
Lein, Kristen (PL)															0.00	\$225.00	\$ -
Kohan, Eric (LC)							0.70								0.70	\$175.00	\$ 122.50
SUB-TOTAL	12.90	47.10	4.20	10.00	0.00	1.00	125.70	194.20	57.80	1.20	7.30	10.40	0.90	12.50	485.20		\$ 133,250.00
GRAND TOTAL:	19.10	48.50	4.20	96.40	33.30	67.90	1349.90	687.30	62.00	82.00	39.00	96.60	7.40	49.00	2642.60		\$ 1,204,872.50

EXHIBIT C

EXHIBIT C**CPM HOURLY RATE CHANGES**

<u>ATTORNEYS</u>	<u>DATE RANGE</u>	<u>HOURLY RATE</u>
Cotchett, Joseph W. (P)	2/2016 - Present	\$950.00
Cotchett, Joseph W. (P)	6/2013 - 1/2016	\$900.00
Williams, Steve N. (P)	1/2016 - Present	\$850.00
Williams, Steve N. (P)	6/2013 - 12/2015	\$700.00
Damrell, Frank C. (P)		\$775.00
Zapala, Adam J. (P)	1/2016 - Present	\$750.00
Zapala, Adam J. (A)	6/2013 - 12/2015	\$415.00
Fineman, Nancy L. (P)		\$700.00
Castillo, Elizabeth T. (P)	1/2019 - Present	\$650.00
Castillo, Elizabeth T. (A)	1/2016 - 12/2018	\$600.00
Castillo, Elizabeth T. (A)	6/2013 - 12/2015	\$360.00
Barnett, Alexander E. (A)		\$450.00
Lambrinos, Demetrius (A)	1/2016 - Present	\$600.00
Lambrinos, Demetrius (A)	8/2015 - 12/2015	\$450.00
Lambrinos, Demetrius (A)	6/2013 - 7/2015	\$415.00
Shapiro, Adam (A)		\$600.00
Trott, Adam (A)		\$600.00
Ram, Mark (A)		\$425.00
Prevost, Tamarah (A)		\$425.00
Chang, Joyce (A)	3/2017 - Present	\$425.00
Chang, Joyce (A)	1/2016 - 2/2017	\$400.00
Chang, Joyce (A)	8/2015 - 12/2015	\$375.00
Lee, Tracy (A)		\$400.00
Nishimura, Chikako (A.)	8/2015 - Present	\$400.00
Nishimura, Chikako (A.)	6/2013 - 7/2015	\$360.00
Nozaki, Shinichi (A.)	8/2015 - Present	\$400.00
Nozaki, Shinichi (A.)	6/2013 - 7/2015	\$360.00

Shima, Yuri (A)		\$400.00
Hwang, Jessica. (A)		\$360.00
LiCalsi, Joanna W. (A)		\$360.00
Payne, Bryan M. (A.)		\$360.00
Ross, Trevor (A)		\$360.00
Wilkinson, Sean (A)		\$360.00
Shannon, Gerard (A)	8/2015 - Present	\$400.00
Shannon, Gerard (A)	6/2013 - 7/2015	\$360.00
NON-ATTORNEYS	<u>DATE RANGE</u>	<u>HOURLY RATE</u>
Verducci, Jaclyn (PL)	1/2016 - Present	\$325.00
Verducci, Jaclyn (PL)	6/2013 - 12/2015	\$250.00
Concepcion, Latoya (PL)		\$325.00
Caylao, Michael (PL)	2/2017 - Present	\$275.00
Caylao, Michael (PL)	1/2016 - 1/2017	\$250.00
Caylao, Michael (PL)	6/2013 - 12/2015	\$225.00
Blehm, Morgan (PL)		\$275.00
Cox, Allison (PL)		\$275.00
Doe, Brian (PL)		\$250.00
Engineer, Nirav (PL)		\$250.00
Menzel, Patrick (PL)		\$250.00
Goldwyn, Priya (PL)		\$250.00
Gaa, Reid (PL)		\$225.00
Garcia, Lasha (PL)		\$225.00
Lein, Kristen (PL)		\$225.00
Kohan, Eric (LC)		\$175.00

EXHIBIT D

**IN RE: LITHIUM ION BATTERIES INDIRECT
TIME REPORT- MONTHLY**

Firm Name: Cotchett, Pitre & McCarthy, LLP

Reporting Period: June 1, 2013 through February 28, 2017

Categories:

- (1) Investigations, Factual Research
 (2) Drafting Discovery Requests
 (3) Drafting Discovery Answers/Responses
 (4) Deposition Taking
 (5) Deposition Defending
 (6) Discovery Meet & Confer
 (7) Document Review

- (8) Drafting Pleadings, Briefs & Pretrial Motions
 (9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
 (10) Class Certification/Experts
 (11) Litigation Strategy, Analysis & Case Management
 (12) Negotiating Settlements
 (13) Trial and Trial Preparation
 (14) Court Appearance and Prep

- (P) Partner
 (A) Associate
 (LC) Law Clerk
 (PL) Paralegal
 (L) Librarian

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	LODESTAR
Cotchett, Joseph W. (P)	17.10						1.60	25.70	17.60			9.50		27.20	98.70	\$950.00	\$93,765.00
Damrell, Frank C. (P)	0.50							4.00	2.50						7.00	\$775.00	\$5,425.00
Fineman, Nancy L. (P)	2.50					14.40	2.50	101.80	5.20					30.20	156.60	\$700.00	\$109,620.00
Williams, Steve N. (P)	10.80	2.00	1.50	9.80	0.00	34.50	3.00	290.50	56.70	97.60	43.30	56.10	0.00	118.00	723.80	\$850.00	\$615,230.00
Barnett, Alexander E. (A)				0.40											0.40	\$450.00	\$180.00
Lambrinos, Demetrius (A)	4.30	11.90	234.80	795.60	21.80	683.90	74.60	450.00	0.00	131.80	28.60	23.70	0.00	124.60	2585.60	\$600.00	\$1,551,360.00
Zapala, Adam J. (A)								6.10	1.90						8.00	\$415.00	\$3,320.00
Chang, Joyce (A)	19.60					6.10		37.50	9.80	11.20	10.40				94.60	\$400.00	\$37,840.00
Hwang, Jessica. (A)							758.10	48.00	0.90		0.50				807.50	\$360.00	\$290,700.00
Lee, Tracy (A)							2313.50								2313.50	\$400.00	\$925,400.00
LiCalsi, Joanna W. (A)	42.50					9.50	4.40	196.20	28.70	2.20	16.30			9.10	308.90	\$360.00	\$111,204.00
Nishimura, Chikako (A.)							1979.10								1979.10	\$400.00	\$791,640.00
Nozaki, Shinichi (A.)							1955.10								1955.10	\$400.00	\$782,040.00
Payne, Bryan M. (A.)		14.10				28.80	72.90	4.80			15.50			8.10	144.20	\$360.00	\$51,912.00
Ross, Trevor (A)							22.00								22.00	\$360.00	\$7,920.00
Shannon, Gerard (A) (English Review Capped at \$350)							1820.50								1820.50	\$350.00	\$637,175.00
Shima, Yuri (A)							23.00								23.00	\$400.00	\$9,200.00
Tran, Elizabeth T. (A)			3.70		2.80	17.80		6.00		2.00	7.70				40.00	\$600.00	\$24,000.00
Wilkinson, Sean (A)							28.00								28.00	\$360.00	\$10,080.00
SUB-TOTAL	97.30	28.00	240.00	805.80	24.60	795.00	9058.30	1170.60	123.30	244.80	122.30	89.30	0.00	317.20	13116.50		\$ 6,058,011.00
NON-ATTORNEYS																	
Doe, Brian (PL)	32.80														32.80	\$250.00	\$8,200.00
Engineer, Nirav (PL)	44.90														44.90	\$250.00	\$11,225.00
Menzel, Patrick (PL)							3.90								3.90	\$250.00	\$975.00
Verducci, Jaclyn (PL)	43.40	16.60	150.00	5.70		35.80	791.60	135.10	39.30		11.30	6.30		64.00	1299.10	\$325.00	\$422,207.50
Concepcion, Latoya (PL)	3.50			26.80											30.30	\$325.00	\$9,847.50
Caylao, Michael (PL)	33.20	76.60	118.20	931.30	1.00	10.50	1065.00	83.20	109.10	189.10	65.30	34.00		165.90	2882.40	\$275.00	\$792,660.00
Gaa, Reid (PL)	2.10	1.40		0.40										1.40	5.30	\$225.00	\$1,192.50
Garcia, Lasha (PL)						52.90	22.40	4.50						2.80	82.60	\$225.00	\$18,585.00
Goldwyn, Priya (PL)				1.30											1.30	\$250.00	\$325.00
Lein, Kristen (PL)														12.60	12.60	\$225.00	\$2,835.00
SUB-TOTAL	159.90	94.60	268.20	965.50	1.00	99.20	1882.90	222.80	148.40	189.10	76.60	40.30	0.00	246.70	4395.20		\$ 1,268,052.50
GRAND TOTAL:	257.20	122.60	508.20	1771.30	25.60	894.20	10941.20	1393.40	271.70	433.90	198.90	129.60	0.00	563.90	17511.70		\$ 7,326,063.50

EXHIBIT E
(REDACTED)

COTCHETT, PITRE & McCARTHY, LLP
Time Slips By Client Report

Client Code	0401189	Begin Date	03/01/17
Customer Name	Lithium ION	End Date	03/11/19
Adam Shapiro			
Class Certification			
01/12/18	Class certification hearing.		4.00
01/19/18	Draft motion for preliminary approval of class action settlement.		2.50
01/20/18	Draft preliminary motion for preliminary approval of class action settlement.		2.50
01/22/18	Draft motion for preliminary approval of class action settlement.		1.80
01/23/18	Edit motion for preliminary approval of class certification.		1.00
01/24/18	Attend, travel to and from class certification hearing.		5.00
06/27/18	Phone call with expert re draft report.		.30
		Total for Class Certification	17.10
Depo Defending			
06/20/18	Prepare for Abrantes-Metz deposition, review expert reports and deposition transcripts.		3.50
07/10/18	Prepare for Abrantes-Metz deposition.		3.00
07/11/18	Review materials for Abrantes-Metz deposition, meet with Abrantes Metz for deposition preparation.		4.00
07/15/18	Travel to and prepare to defend Abrantes Metz deposition.		8.30
07/16/18	Meeting with Abrantes Metz to prepare for deposition, prepare for meeting.		3.50
07/17/18	Defend Abrantes Metz deposition, travel home from deposition.		11.00
		Total for Depo Defending	33.30
Depo Taking			
05/11/18	Prepare for and take 30(b)(6) deposition of Cornwell.		2.00
		Total for Depo Taking	2.00
Discovery Meet & Confer			
05/09/18	Conference call with Black and Decker re third-party subpoena, conference call with co-counsel.		1.00
		Total for Discovery Meet & Confer	1.00
Discovery-Doc Review			
01/05/18	Review third party subpoenas and responsive document productions.		1.00

01/18/18	Review third party production.	.50
	Total for Discovery-Doc Review	1.50
Draft Discovery Requests		
04/26/18	Draft meet and confer letter re Black and decker subpoena.	.80
05/02/18	Phone call with Robert Bosch re third party subpoenas, conference call with co-counsel re case strategy.	.60
	Total for Draft Discovery Requests	1.40
Investigation/Factual Research		
12/26/17	Review third party subpoenas.	.20
04/24/18	Phone calls with counsel for ██████████ re ██████████. Legal research regarding ██████████	1.80
	Total for Investigation/Factual Research	2.00
Litigation Strategy Analysis		
12/21/17	Discuss ██████████ with AZ.	.50
03/07/18	Phone call with co-counsel re ██████████ (.7), update drafts of meet and confer letters to third parties re ██████████ (.6).	1.30
05/10/18	Meet and confer with ██████████ re ██████████, prepare for ██████████ deposition, prepare deposition subpoena to ██████████	2.50
	Total for Litigation Strategy Analysis	4.30
Pleadings, Briefs, Pretrial Motion		
02/20/18	Resarch and draft response to ██████████ appeal.	3.50
02/27/18	Edit motion for preliminary approval of class action settlement for ██████████	1.30
03/02/18	Draft motion for preliminary approval of settlement, draft response to ██████████ ██████████	5.10
03/03/18	Draft response to ██████████ ██████████	.30
03/05/18	Draft motion for preliminary approval, review order on motion for class certification.	3.40
03/19/18	Research and draft opposition to ██████████ ██████████	6.50
03/20/18	Draft response brief in ██████████.	10.30
03/21/18	Draft and edit response brief for ██████████ (7.0), phone call with co-counsel (.4), prepare 30(b)(6) subpoenas for third parties (.1).	7.50
03/22/18	Edit appellate brief for ██████████.	.40
03/26/18	Phone call with co-counsel, research ██████████ law, edit answering brief, work with paralegal support on supplemental excerpts of record.	4.30
03/27/18	Research and edit answer to ██████████.	5.50
03/28/18	Discuss ██████████ with co-counsel and ██████████. Edit brief.	1.00
03/29/18	Edit brief for ██████████	7.50
03/30/18	Prepare supplemental excerpts of record and edit responsive brief for ██████████ (1.0), draft 30(b)(6) subpoenas to ██████████.	1.50

04/02/18	Edit response brief for ██████████ and prepare for filing.	4.00
04/03/18	Update notice of related cases for ██████████, review reply in support of Rule 23(f) appeal, coordinate third party depositions.	.80
	Total for Pleadings, Briefs, Pretrial Motion	62.90
Review Plead./Brief/Disc./Mot		
03/06/18	Review class certification order.	.30
	Total for Review Plead./Brief/Disc./Mot	.30
Settlement		
02/16/18	Draft response brief to objector's appeal from settlement.	4.10
03/17/18	Draft response to ██████████.	2.00
07/18/18	Phone calls with co counsel re Panasonic settlement offer, draft correspondence regarding ██████████	1.50
	Total for Settlement	7.60
	Total for Adam Shapiro	133.40

Adam Trott

Pleadings, Briefs, Pretrial Motion

08/18/18	Review background material in preparation for drafting opp to MSJ sections on ██████████ and ██████████	2.50
08/20/18	Review background documents to begin outline of opposition to MSJ sections on ██████████ and ██████████.	5.10
08/21/18	Review background documents to begin outline of opposition to MSJ sections on ██████████ and ██████████.	3.40
08/22/18	Conduct legal research and begin drafting sections on ██████████ and ██████████ ██████████ for opposition to MSJ.	6.20
08/23/18	Finish drafting sections on opposition to MSJ on ██████████ and ██████████ ██████████	2.40
08/27/18	Revise opposition to MSJ brief section on ██████████ ██████████ ██████████	3.20
09/04/18	Revise opposition to Defendants' MSJ per comments of MFR.	2.80
09/06/18	Review spreadsheet of documents in this case to determine which to cite in MSJ brief concerning ██████████ and incorporate into brief.	4.10
09/07/18	Review separate statement from MFR and suggest edits and find supporting paragraphs in expert reports and supporting documents (3.8); review spreadsheet of ██████████ ██████████ to determine which to ██████████ for opposition to MSJ brief and then review ██████████ (3.4); revise opposition to MSJ brief per comments of AJZ and MFR in preparation for filing (2.2)	9.40
10/05/18	Review and edit ██████████ reply and input helpful suggested edits from co-counsel, as necessary.	3.80
	Total for Pleadings, Briefs, Pretrial Motion	42.90
	Total for Adam Trott	42.90

Adam Zapala

Class Certification

12/09/17	Review refiled class certification motion.	1.00
Total for Class Certification		1.00

Court Appearances & Prep

10/02/17	Preparation for final approval hearing; call with claims stimulator.	1.70
10/03/17	Preparation for; travel to; attendance at motion for final approval; travel back.	3.90
01/12/18	Preparation for; travel to; attendance at motion for class certification; meeting with co counsel; travel back.	5.50
02/28/19	Prepare for moot court for preliminary approval, travel to san Francisco for meeting at LCHB; attendance at moot court and strategy session. Travel back to office.	4.70
03/05/19	Preparation for; travel to, attendance at hearing re preliminary approval hearing.	5.10
Total for Court Appearances & Prep		20.90

Depo Taking

07/23/18	Preparation for deposition of Laila Haider.	.60
07/25/18	Preparation for deposition of Laila Haider.	11.20
07/26/18	Preparation for deposition of Laila Haider.	8.60
07/27/18	Preparation for deposition of Laila Haider.	9.20
07/28/18	Preparation for deposition of Laila Haider.	4.50
07/29/18	Preparation for deposition of Laila Haider.	2.20
07/30/18	Travel to D.C.; preparation for deposition of Laila Haider.	14.20
07/31/18	Deposition of Laila Haider.	11.50
Total for Depo Taking		62.00

Discovery Meet & Confer

03/07/18	Call with co lead counsel re class cert order and various action items. Begin review of power tools meet and confer.	1.60
07/09/18	Begin review of expert reports for Haider depo.	.70
07/10/18	Review of expert reports in preparation for Haider deposition.	.50
09/26/18	Call with co lead counsel re various action items.	.50
Total for Discovery Meet & Confer		3.30

Investigation/Factual Research

05/09/18	Call with co lead counsel re various action items; discussion of [REDACTED] and [REDACTED]	.80
Total for Investigation/Factual Research		.80

Litigation Strategy Analysis

12/13/17	Preparation for call with lead counsel; call with lead counsel re [REDACTED].	.90
12/20/17	Preparation for call and call with co lead counsel re action items and [REDACTED] decisions.	.70
01/10/18	Call with lead counsel re various issues.	.30
01/24/18	Calls with co lead counsel re various action items; including pending settlements.	1.00
03/21/18	Attendance on weekly call with co counsel re strategy and action items.	1.00
03/28/18	Call with co lead counsel re various issues.	.90
04/18/18	Call with co counsel re various action items.	.70
04/19/18	Call with co lead counsel re various action items.	1.00
09/12/18	Preparation for co lead counsel call; attendance on call re various action items.	.50

Total for Litigation Strategy Analysis 7.00

Pleadings, Briefs, Pretrial Motion

02/26/18	Editing brief re discovery disputes; working on [REDACTED] settlement, review of meet and confer letters re [REDACTED].	2.20
03/18/18	Review/editing Rule 23(f) appeal.	3.50
03/22/18	Edits to appeal brief.	1.50
03/26/18	Review and edit of appeal to objector; providing comments re [REDACTED] legal research re [REDACTED] Edits to 23(f) petition.	6.80
04/02/18	Finalizing opposition to objector Andrews' appeal.	2.10
04/06/18	Working on edits to Rule 23(f) reply brief. Email correspondence with lead counsel re [REDACTED].	3.10
05/07/18	Review of expert decl., edits [REDACTED].	1.60
05/08/18	Editing [REDACTED]; call with Brendan Glackin re [REDACTED].	6.90
05/14/18	Review and comment on expert reports.	.80
05/22/18	Review and edit of [REDACTED].	1.90
05/23/18	Call with co lead counsel re various action items; review of expert report.	1.20
05/25/18	Review and edits to experts report for merits.	2.10
06/20/18	Editing appeal brief.	1.40
07/15/18	Edits re appeal brief; emails with lead counsel re [REDACTED].	.70
07/16/18	Further edits to appeal brief on objectors.	1.50
08/01/18	Drafting outline of Daubert for Haider. Sharing same with Tamarah.	2.30
08/03/18	Review initial draft of Haider Daubert motion.	1.00
08/04/18	Continued review and edit of Haider Daubert.	.50
08/06/18	Continued review and edit of Haider Daubert.	4.50
08/07/18	Continued review and edit of Haider Daubert.	9.00
08/08/18	Continued review and edit of Haider Daubert motion.	10.00
08/09/18	Continued review and edit of Haider Daubert	3.20
08/10/18	Continued review and edit of Haider Daubert	5.50

08/11/18	Quick review of materials submitted yesterday re [REDACTED].	1.50
08/15/18	Review of summary judgment motion from Panasonic; meeting with team re [REDACTED] begin legal research.	2.20
08/17/18	Legal research re [REDACTED]	.60
08/20/18	Working on opposition to SMJ.	1.00
08/22/18	Working on opposition to SMJ.	1.30
08/23/18	Drafting, editing, legal research re opposition to SMJ.	2.80
08/29/18	Drafting opposition to SMJ, legal research re same.	1.50
09/04/18	Drafting, editing, conducting legal research re Opposition to MSJ.	3.50
09/05/18	Drafting, editing, conducting legal research re Opposition to MSJ.	11.10
09/06/18	Drafting, editing, conducting legal research re Opposition to MSJ.	11.40
09/07/18	Finalizing opposition to SMJ in lithium. Editing same; getting ready for filing.	3.50
09/08/18	Call with Joanne re filing of opposition to SMJ; review of pleading.	1.00
09/10/18	Review of our SMJ opposition filing.	.50
09/19/18	Attendance on lead counsel call.	.50
10/03/18	Drafting, editing reply brief re daubert motion of defendants' economist.	3.90
10/04/18	Drafting, editing, researching Daubert reply brief re defendant's economist.	13.50
10/05/18	Finalizing Plaintiffs' reply daubert brief re Haider; editing, preparing for filing; filing.	6.10
10/06/18	Reviewing all materials filed yesterday re ECF, for any corrections; arranging for courtesy copies.	1.50
10/24/18	Call with Marc Seltzer re [REDACTED].	.50
12/11/18	Review of proposed case management statement re settlements.	.50
	Total for Pleadings, Briefs, Pretrial Motion	141.70

Settlement

12/22/17	Call with Jeff Friedman re [REDACTED].	.30
12/27/17	Attendance on call of lead counsel; various action items; drafting and finalizing [REDACTED]; discussion with Trey Nicoud re [REDACTED].	2.10
12/29/17	Work on settlement agreement with NEC Tokin.	.50
01/03/18	Working on [REDACTED] settlement agreement.	1.00
01/04/18	Working on [REDACTED] settlement.	1.20
01/05/18	Working on settlement with [REDACTED]	.70
01/15/18	Correspondence with co lead counsel re various settlement issues.	.20
01/19/18	Email correspondence with co lead counsel re settlement.	.60
02/13/18	Work on [REDACTED].	1.10
03/02/18	Work on [REDACTED].	.40
03/06/18	Finalizing settlement materials with [REDACTED] review of court's order re class certification.	1.80

10/25/18	Call with co lead counsel re [REDACTED], and various action items. Calls with [REDACTED] counsel, Marc Seltzer re [REDACTED]. Sending him some materials for purposes of the position statement.	2.00
11/01/18	Call with co lead counsel re [REDACTED].	.50
11/20/18	Review of submission to special master, email with co counsel re [REDACTED], call with Leslie Weaver re [REDACTED]	1.20
11/21/18	Call with counsel re [REDACTED]	.40
11/28/18	Providing comments to settlement agreement.	1.30
12/18/18	Dealing with a class member question re [REDACTED]	.30
01/03/19	Co lead counsel call re [REDACTED].	.60
01/11/19	Review of pleading re appeal; edits re same.	.50

Total for Settlement 16.70

Trial Prep & Trial

10/10/18	Calls with co lead counsel re [REDACTED].	2.70
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Total for Trial Prep & Trial 2.70

Total for Adam Zapala 251.00

Allison Cox

Court Appearances & Prep

01/09/18	Hearing Binder for AJZ	1.20
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Total for Court Appearances & Prep 1.20

Total for Allison Cox 1.20

Chikako Nishimura

Discovery-Doc Review

05/15/17	Locate [REDACTED] for fee motion purposes.	6.50
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Total for Discovery-Doc Review 6.50

Total for Chikako Nishimura 6.50

Demetrius Lambrinos

Class Certification

04/14/17	review court order denying (in part) class certification - notes re [REDACTED] (2.7)	2.70
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04/20/17	emails J Cuneo re [REDACTED] (1.6); redlines to stip re MIL objection to PO (.6)	2.20
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04/25/17	call with experts on class cert order and strategy re same (1.0); call with co-leads re [REDACTED] (.6)	1.60
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05/09/17	Call with experts re [REDACTED] (1.2)	1.20
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05/10/17	Call with B Siegel and Prep motion for request to serve letters rogatory on third party packers (.9)	.90
05/31/17	draft motion for letters rogatory to simple and dynapack	4.10
06/06/17	Call with co-leads re [REDACTED] and review pleading prepared by HBSS re [REDACTED] (.9); emails with co-leads re [REDACTED] (issues re [REDACTED] [REDACTED])(.8).	1.70
06/07/17	attn to letters rog project [REDACTED] and review letter to simple us subsidiary	.80
06/12/17	Draft revise motion re letters rogatory – review documents from Simple and Dynapack re same (1.9); review letter from Simple USA re [REDACTED] (.4)	2.30
06/13/17	Draft/revise motion re letters rogatory (3.6); draft and revised sealing motion and supporting declaration re [REDACTED] - meet and confer emails and calls to designating defendants re [REDACTED] (2.3)	5.90
06/14/17	Draft motion re letters rogatory, supporting declaration and sealing motion re same (1.9)	1.90
06/15/17	Draft and finalize motion re letters rogatory and sealing motion re same (4.2) exchange emails with B Siegel and S Scarlet re [REDACTED] (.4) finalize translations/exhibits for Lambrinos Declaration (.6)	5.20
06/16/17	Legal research re whether [REDACTED] [REDACTED] (1.9); memo to SNW re same (1.8)	3.70
06/19/17	Revise draft portion of letter brief re [REDACTED] [REDACTED]	1.10
06/20/17	Redlines to MSFT Submission and IPP Joinder re Letters Rogatory (.4); review Simple USA MTC (.8)	1.20
06/23/17	Review and analyze MSFT's motion for issuance of letters rogatory (.9); review and redline joinder re same (.4)	1.30
06/27/17	Review and revise draft letter brief re [REDACTED] [REDACTED] (1.9); review email from [REDACTED] (.5); revise draft letters rogatory motion – email re [REDACTED] (.3); email re [REDACTED] (.2);	2.90
06/28/17	Review and revise Simple USA's motion to quash IPPs deposition subpoena in D. Wyoming (1.8); revise/finalize draft letters rogatory motion – email to co-leads re [REDACTED] (3.9); phone call re [REDACTED] (.4);	6.30
07/06/17	Call with experts re [REDACTED] and [REDACTED] – prep re [REDACTED]	1.30
07/07/17	Draft Joint CMC and Class Cert/Trial Schedule submission for IPPs – circulate to co-counsel; (.7); confer with SNW and co-counsel re [REDACTED] (.6); confer with Defendants re [REDACTED] (.4).	1.70
	Total for Class Certification	50.00
Court Appearances & Prep		
06/29/17	Prep for hearing on Letters Rogatory motion – draft outline	.40
07/19/17	Prep for hearing on renewed motion for class certification – review scheduling order	.40
	Total for Court Appearances & Prep	.80

Depo Taking

03/03/17	Take deposition of Nego (Sony) - second chair (8.2); travel from NYC to SF re same (7.1)	15.30
03/07/17	research potential SDI depositoin candidates in post-2008 time frame	1.10
05/10/17	Emails with Lin re [REDACTED] (8)	.80
07/03/17	Review Panasonic documents related to [REDACTED] (1.9); review [REDACTED] for prospective deposition of [REDACTED] (1.3)	3.20
07/18/17	Call with Panasonic counsel re [REDACTED] - strategy email to SNW re [REDACTED] - call with L Chan re same	1.60
08/14/17	attention to prep and logistics of Niko deposition	.40
	Total for Depo Taking	22.40

Discovery Meet & Confer

05/24/17	fee and expense motion - draft and revise motion (4.2); collect and organize expense information (1.9); attn to government entity issues (.4); collect class rep declarations re incentive awards (1.1);redact time for privilege (2.2); collect supporting counsel fee declarations (1.3)	11.10
06/02/17	review letter from IPPs to Panasonic re [REDACTED]	.30
06/27/17	review and respond to email from L Chan re [REDACTED] (.6); strategy emails re [REDACTED] (.9)	1.50
06/28/17	draft letter re [REDACTED] (.6); review documents and draft deposition notices for Hikita and Niko (name of Panasonic witnesses stemming from L Chan email and E Cole letter re [REDACTED] (1.3); review prior Panasonic correspondence for items relating to [REDACTED] (.9);	2.80
06/29/17	Draft deposition notices for Panasonic/Sanyo employees Niko and Hikita - emails with co-leads re [REDACTED] (.9); email to [REDACTED] re [REDACTED] (.9); review and analyze documents and interrogatory responses showing Honma's [REDACTED] (1.1); review documents re [REDACTED] (.8).	3.70
06/30/17	Finalize and serve notices for Hikita and Niko (Panasonic) - email to DPPs and Co-counsel re [REDACTED] - prep for depositions	1.30
07/06/17	Draft Plaintiffs' Fourth Set of Rogs to Defendants (re [REDACTED])	.90
07/07/17	Review documents re potential deposition of Honma (Sanyo)(1.6); set up meet and confer re [REDACTED] (.6)	2.20
07/10/17	Call with E Cole re [REDACTED] (.7); review documents re [REDACTED] and send confirming email to [REDACTED] re [REDACTED] (.9)	1.60
07/11/17	Draft summary email re [REDACTED] / [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] for co-leads (.8); review [REDACTED] documents re [REDACTED] (.9)	1.70

07/15/17	Draft letter to [REDACTED] re [REDACTED] [REDACTED] ([REDACTED]-[REDACTED] - email to [REDACTED] re [REDACTED]	.90
07/21/17	Analyze letter re [REDACTED] ([REDACTED] [REDACTED] (.8); draft/revise summary email to [REDACTED] [REDACTED] - review documents and deposition transcripts re [REDACTED] (2.4); re-file Ex 3 to letter rog motion publicly (.2).	3.40
07/24/17	Follow up with co-leads on the status of the next round of depositions against Panasonic - review documents and prior correspondence re [REDACTED] (1.2); research re [REDACTED] and [REDACTED] (.9)	2.10
07/25/17	Strategy email to co leads re [REDACTED]	2.20
07/26/17	Prep Notice for Asai and strategy email to [REDACTED] (.9); call Matt Brown (Cooley) re [REDACTED] (.1)	1.00
07/27/17	draft 30b1 notice for [REDACTED] - research and review documents re same (1.7); follow up with Panasonic counsel re [REDACTED] - and research/review documents re same (.9); review translations of other Panasonic employee [REDACTED] documents (1.1)	3.70
08/01/17	Follow up with Panasonic counsel on Niko and Asai notices (.8)	.80
08/07/17	Follow up on Asai and Niko (Panasonic) deposition notices	.30
08/08/17	Prep for Niko deposition - emails with co-counsel and review documents (.8); summary memo/email to [REDACTED] (.9); summary email to [REDACTED] (.6)	2.30
08/10/17	Attn to Asai deposition notice (.4); Prep [REDACTED] [REDACTED] proposed deposition summary to SNW and co-leads (1.6)	2.00
08/15/17	Prep for call with Panasonic counsel re [REDACTED]	.30
08/16/17	attn to letter from Panasonic re Asai (.5); draft [REDACTED] [REDACTED] rog (.6); call with Panasonic counsel re [REDACTED] (.7); email re [REDACTED] to opposing counsel (.8)	2.60
08/29/17	email and phone call with L Chan re updating list of [REDACTED] - follow up and research re [REDACTED]	3.10
	Total for Discovery Meet & Confer	51.80

Litigation Strategy Analysis

07/03/17	research re pending appellate deadlines for [REDACTED]	.60
	Total for Litigation Strategy Analysis	.60

Pleadings, Briefs, Pretrial Motion

03/02/17	add redlines to letter re Cannon	.30
06/02/17	draft motion re [REDACTED] (2.2); review MSFT filing and supporting declaration re same (.6)	2.80
06/05/17	Revise motion for [REDACTED] (2.5); strategy emails with co-leads re [REDACTED] (.6)	3.10
06/09/17	draft motion for [REDACTED] - supporting declaration - proposed order - and sealing motion re same	3.10

06/29/17	Finalize and file IPPs' motion for [REDACTED] and sealing motion re same (1.7); phone call and follow up emails with SDI counsel re [REDACTED] and [REDACTED] (1.6).	2.30
07/05/17	Research for SNW re [REDACTED] – needed for SNW's draft of [REDACTED] (.9)	.90
07/17/17	Draft/Revise letter to Court re [REDACTED] – email to co-leads and revisions re [REDACTED]	.90
07/18/17	Revise/Draft letter to Ryu re [REDACTED] and [REDACTED]	.40
07/20/17	Prep for filing of unsealed Ex [REDACTED] re [REDACTED] project.	1.40
07/28/17	call with DAPs re CMC statement - email to [REDACTED] re [REDACTED]	.40
08/09/17	review objection filed by Bednarz in preparation for drafting [REDACTED]	1.10
08/11/17	review and analyze objections filed by Morgan in prep for [REDACTED]	1.10
08/21/17	drafting motion for final approval of IPP settlements with LG Chem, Hitachi, and NEC	5.90
08/22/17	draft motion for final approval of second round settlements, and supporting declaration	6.70
08/23/17	draft omnibus response to objections (6.2); draft strategy emails to [REDACTED] (.6)	6.80
08/24/17	draft omnibus response to objections (5.3); revised supporting declarations (1.6)	6.90
08/25/17	draft and revise motion for final approval of second round settlements, responses to objectors, and supporting declarations re same	5.50
08/28/17	draft and revise (finalize and file) motion for final approval, responses to objections, supporting declarations, proposed order, and order of judgment re second round settlements	7.60
Total for Pleadings, Briefs, Pretrial Motion		57.20

Settlement

03/01/17	Final Approval Research - [REDACTED]	1.40
03/03/17	Prep for SDI mediation session with V. Walker - review documents cited in mediation statement	1.80
03/06/17	Attend SDI mediation session with V. Walker	6.90
03/08/17	redlines to HML notices and preliminary approval motion, and supplemental submission re motion for final approval of LGC settlement (1.3)	1.30
03/13/17	email with Matt Brown re [REDACTED] (1.1)	1.90
03/14/17	call with M Brown re [REDACTED]	.80
03/20/17	email to class rep (Kopp) re [REDACTED]	.20
04/17/17	emails with M. Brown and B Siegel re Sony [REDACTED]	.60
04/18/17	Call with M Brown and B Siegel to discuss Sony [REDACTED]	.60
06/09/17	review new set of objections filed by [REDACTED]	.90
06/26/17	Review new objection filed against settlements by [REDACTED]	.60

		Total for Settlement	17.00
		Total for Demetrius Lambrinos	199.80
Elizabeth Castillo			
Discovery-Doc Review			
06/05/17	Discussed potential Japanese reviewers for special project with Demetrius		.20
		Total for Discovery-Doc Review	.20
Pleadings, Briefs, Pretrial Motion			
08/07/18	Discussed Daubert [REDACTED] with team		.20
		Total for Pleadings, Briefs, Pretrial Motion	.20
		Total for Elizabeth Castillo	.40
Eric Kohan			
Discovery-Doc Review			
06/16/17	Helped DXL with "[REDACTED]" issue regarding co-counsel's dispute with certain defendants on [REDACTED], and determining if CPM could [REDACTED]		.70
		Total for Discovery-Doc Review	.70
		Total for Eric Kohan	.70
Jaclyn Verducci			
Depo Taking			
09/26/17	[REDACTED]		.20
		Total for Depo Taking	.20
Investigation/Factual Research			
09/19/17	Research rules re [REDACTED] and communicate with team re [REDACTED]		.40
08/20/18	Read order re Compliance hearing (.1) Meeting with AJZ, TPP and AJT re MSJ and follow up research re [REDACTED] (.4)		.50
10/10/18	Organize/Review depo transcripts (.8)		.80
10/29/18	Review withdrawal of subpoena for Samsung depo transcripts		.10
		Total for Investigation/Factual Research	1.80
Litigation Strategy Analysis			
02/23/18	Draft memo re case status		.20
		Total for Litigation Strategy Analysis	.20

Pleadings, Briefs, Pretrial Motion

08/28/17	Review/edits to final approval motion	.50
09/18/17	Darft Notice of Appearance for A. Zapala	.40
06/27/18	Review Leamer draft report (.3) Communications re [REDACTED] (.2)	.50
03/11/19	Review order re Final Approval schedule and update case calendar re same (.4)	.40
Total for Pleadings, Briefs, Pretrial Motion		1.80

Review Plead./Brief/Disc./Mot

03/20/17	Review orders re settlement and reimbursement of expenses	.40
01/09/18	Review Flex Response to LG RFA & Interrogatory	.30
03/05/18	Review order denying class cert and order re next CMC	.30
08/21/18	Read Motion to Strike IPPs' Corrected Second Renewed Motion for Class Certification and Motion for Expedite Consideration of Panasonic and Sanyo Defendants Motion to Strike IPPs' Corrected Second Renewed Motion for Class Certification (.5)	.50
10/16/18	Review IPP's Opposition to Panasonic and Sanyo Defendants' Administrative Motion to Stay Proceedings and Continue the Trial Pending Resolution of Panasonic's Summary Judgment Motion (.2)	.20
10/17/18	Read order denying Panasonic's motion to stay (.1)	.10
Total for Review Plead./Brief/Disc./Mot		1.80
Total for Jaelyn Verducci		5.80

Joseph Cotchett

Litigation Strategy Analysis

08/22/17	Meeting with Saveri attorneys and SNW in San Francisco.	2.00
03/05/18	Review of Order from Court on denial of class cert - review and correspondence regarding [REDACTED].	2.50
Total for Litigation Strategy Analysis		4.50
Total for Joseph Cotchett		4.50

Joyce Chang

Court Appearances & Prep

10/02/17	Reviewing correspondence from claims administrator re [REDACTED];	1.20
10/02/17	Reviewing [REDACTED] prior to court hearing	1.70
10/02/17	Call w claims administrator re [REDACTED]	.60
10/03/17	Final approval and attorneys' fees hearing; travel to and from Oakland	4.50
10/03/17	Reviewing binder prior to final approval and attorneys fee hearing.	1.20
Total for Court Appearances & Prep		9.20

Discovery Meet & Confer

09/16/17	Reviewing letter to Panasonic and Sanyo re outstanding discovery issues; review of the same for background.	1.80
09/19/17	Mtg w team re [REDACTED].	.30
09/29/17	Review of meet and confer letter from Panyo	.20
Total for Discovery Meet & Confer		2.30

Investigation/Factual Research

09/19/17	Correspondence w team re [REDACTED]; research re [REDACTED] mtg with team re [REDACTED]	.80
Total for Investigation/Factual Research		.80

Litigation Strategy Analysis

03/01/17	Call w co counsel re [REDACTED].	.40
08/31/17	Mtg w internal team to discuss [REDACTED] in the case	.30
09/11/17	Conference call w coleads re [REDACTED] and [REDACTED].	.40
09/28/17	Search for vendor contact information; correspondence w cocounsel.	.30
Total for Litigation Strategy Analysis		1.40

Pleadings, Briefs, Pretrial Motion

08/28/17	Final edits and search for citations to mtn for final approval and objectors' briefs; coordinating filing with team; final proofread.	2.00
08/28/17	Shepardizing and citechecking motion for final approval brief; technical and substantive; incorporating edits.	2.80
08/28/17	Shepardizing and citechecking objectors brief; technical and substantive; incorporating edits.	2.80
09/19/17	Mtg w team re [REDACTED]; research re [REDACTED]	1.30
09/19/17	Correspondence w co-counsel re [REDACTED] mtg w team re [REDACTED] research re [REDACTED]	4.40
09/20/17	Reviewing draft letter re letters rogatory; research and confirm [REDACTED] reviewing court order	1.20
09/22/17	Preparing letters rogatory for delivery; mtg w team	.60
09/22/17	Review of sealing stip.	.30
09/23/17	Brief review of Leamer supplemental class cert report	1.80
10/16/17	Final review of supplemental submission re antitrust fee awards.	.60
Total for Pleadings, Briefs, Pretrial Motion		17.80

Total for Joyce Chang 31.50

Mark Ram

Class Certification

09/04/18	Analysis of amended order striking class certification motion to determine [REDACTED] [REDACTED] [REDACTED] [REDACTED]	.30
	Total for Class Certification	.30
Investigation/Factual Research		
05/10/17	Research for [REDACTED]: review of email from B. Siegel re [REDACTED] and conference call w/ B. Siegel and D. Lambrinos.	.40
	Total for Investigation/Factual Research	.40
Pleadings, Briefs, Pretrial Motion		
08/09/18	Draft motion to seal and supporting materials for motion to exclude Dr. Haider testimony (2.8); revise motion to exclude Dr. Haider testimony based on comments from [REDACTED] [REDACTED] [REDACTED] (1.5).	4.30
08/10/18	Revise proposed order and Zapala declaration in support of motion to seal motion to exclude Haider testimony (0.6); telephone calls w/ A. Zapala re [REDACTED] [REDACTED] (0.3); edits to and finalize for filing motion to exclude testimony of Dr. Haider (2.9); attention to and oversight of filing of motion to seal and motion to exclude testimony of Dr. Haider (1.5).	5.30
08/15/18	Analysis of motion for summary judgment for drafting opposition.	.80
08/20/18	Legal research re [REDACTED] (5.1); analysis of defendants' interrogatories for [REDACTED] (0.2); analysis of operative complaint for [REDACTED] (1.1); review of [REDACTED] for [REDACTED] (0.3).	6.70
08/21/18	Continued legal research re [REDACTED] (1.2); analysis of evidence for [REDACTED] (0.4); analysis of Leamer merits report for [REDACTED] (0.9); analysis of Haider merits report for [REDACTED] [REDACTED] (0.8); draft [REDACTED] (0.5).	3.80
08/22/18	Continued review of evidence for potential citation in [REDACTED] (2.1); conference call w/ co-lead counsel re [REDACTED] [REDACTED] (0.3); continued legal research re [REDACTED] (2.2); draft MSJ opposition section re [REDACTED] (2.6).	7.20
08/23/18	Continued drafting of opposition to [REDACTED] [REDACTED] motion section re [REDACTED]	1.20
08/25/18	Continued drafting opposition to motion for summary judgment section re [REDACTED]	1.30
08/26/18	Edit opposition to summary judgment motion section re [REDACTED]	1.60
08/27/18	Continued drafting and editing of opposition to summary judgment motion section re [REDACTED] (7.7); analysis of Plaintiffs' rog responses for [REDACTED] [REDACTED] (0.6); draft responsive separate statement in opposition to [REDACTED] [REDACTED] (1.1).	9.40
08/28/18	Edit summary judgment opposition section re [REDACTED] (1.4); conference w/ A. Trott re [REDACTED] (0.2).	1.60
08/29/18	Continued drafting responsive separate statement in opposition to [REDACTED] [REDACTED]	5.70
08/30/18	Continued drafting of responsive separate statement in opposition to [REDACTED] [REDACTED]	6.50
08/31/18	Revise responsive separate statement in opposition to [REDACTED].	.30

09/06/18	Conference w/ A. Zapala re [REDACTED] (0.6); analysis of evidence to add to responsive separate statement in opposition to [REDACTED] (3.6); draft additions to responsive separate statement in opposition to [REDACTED] (2.6); edit and revise responsive separate statement for length (2.7).	9.50
09/07/18	Edits to responsive separate statement based on [REDACTED] (5.3); draft Zapala declaration in opposition to motion for summary judgment (1.1); finalization and filing of opposition to motion for summary judgment, responsive separate statement, and Zapala declaration (5.5).	11.90
09/17/18	Draft and oversee filing of corrected responsive separate statement in opposition to motion for summary judgment.	2.50
10/04/18	Conference w/ A. Zapala re [REDACTED] (0.4); research re [REDACTED] (4.4).	4.80
10/05/18	Edit cites in reply brief in support of motion to exclude testimony of Dr. Haider.	.60
	Total for Pleadings, Briefs, Pretrial Motion	85.00

Settlement

08/15/18	Telephone conference with co-lead counsel re [REDACTED]	1.00
	Total for Settlement	1.00
	Total for Mark Ram	86.70

Michael Caylao

Class Certification

05/25/18	Download and review expert backup materials for expert report of Abrantes-Metz and review [REDACTED]	1.20
	Total for Class Certification	1.20

Court Appearances & Prep

09/26/17	Create binder for hearing re [REDACTED]	1.30
10/02/17	Create binder for [REDACTED]	2.30
12/05/17	Create hearing binder re [REDACTED]	1.40
02/26/19	Create hearing binder for AJZ with all relevant materials for [REDACTED]	2.60
	Total for Court Appearances & Prep	7.60

Depo Taking

07/09/18	Print Expert materials for [REDACTED] to review in preparation for defending [REDACTED]	.30
07/10/18	Review correspondence and calendar expert deposition dates for IPP Expert Leamer and Defs' Expert Haider (0.1); [REDACTED] - prepare binder of [REDACTED] (2.5)	2.60

07/20/17	Review [REDACTED] deposition transcripts for testimony re [REDACTED] and send [REDACTED]) all exhibits that reference [REDACTED].	4.40
07/21/17	Search for [REDACTED] document/informal translation related to [REDACTED] (0.5); search for [REDACTED] document related to [REDACTED] (1.3); search for [REDACTED] document related to [REDACTED] (1.6)	3.40
08/04/17	[REDACTED] depo prep - review defendants' deposition transcripts for references to [REDACTED] highlight and flag all instances	2.60
08/07/17	[REDACTED] depo prep - review defendants' deposition transcripts and deposition exhibits for references re [REDACTED]	6.20
08/09/17	[REDACTED] depo prep - review Defendants' deposition exhibits for references to [REDACTED]	1.80
08/10/17	[REDACTED] Depo Prep - review past deposition exhibits and hot documents for mentions of [REDACTED]	5.70
08/24/17	Search Transpacific docket for [REDACTED]	.60
08/29/17	Gather all materials/review re [REDACTED] and send to [REDACTED] (1.2); Review [REDACTED] and [REDACTED] and [REDACTED] logs for documents re [REDACTED] (2.2)	3.40
09/07/17	Review [REDACTED] privilege and clawback logs and send relevant docs to [REDACTED]	1.70
12/14/17	Correspondence with [REDACTED] re deposition exhibit numbering and tracking chart	.40
12/27/17	search for 3rd party subpoenas to [REDACTED], search for productions on database	1.80
01/02/18	Search for and obtain [REDACTED] productions received from [REDACTED] and [REDACTED] review and update doc production log	2.20
01/03/18	Correspondence re [REDACTED] discovery with [REDACTED]	1.00
01/19/18	Attn to all [REDACTED] & [REDACTED] productions, download from FTP site, and update [REDACTED] tracking chart (1.7); correspondence re [REDACTED] (0.4)	2.10
01/22/18	Search through [REDACTED] and [REDACTED] correspondence re [REDACTED] (0.8); search through discovery files to obtain total numbers of docs, size and date of total productions, number of depositions, of each of the settling defendants, and create chart of discovery letter briefs filed (4.7)	4.50
01/23/18	Update [REDACTED] chart and send to [REDACTED]	.70
03/15/18	review joint letter brief re [REDACTED], calendar new hearing date	.40
04/03/18	Review correspondence from [REDACTED]	.10
04/10/18	Review letter brief re [REDACTED]	.60
04/12/18	Search for all [REDACTED] discovery responses from all [REDACTED] create sharefile link for download, send to [REDACTED] for review (0.6); review letter brief re [REDACTED] of certain [REDACTED] records and further responses to interrogatories (0.9)	1.50
04/26/18	Download document production received from [REDACTED] [REDACTED] update [REDACTED] chart (0.7); review [REDACTED] [REDACTED] amended responses to [REDACTED] (2.1)	2.80
04/27/18	Review correspondence re [REDACTED] [REDACTED] update [REDACTED] chart	.20
05/10/18	Search through all of [REDACTED] documents productions for [REDACTED]	.90
06/16/18	Review correspondence re [REDACTED]	.30
06/28/18	Correspondence with [REDACTED], update [REDACTED] log and [REDACTED] log.	2.60

03/21/18	Draft [redacted] depo notices, subpoenas, and attachment [redacted] topics for [redacted]	4.70
03/28/18	Create Attachment [redacted] of [redacted] depo notice to 3rd parties	3.30
04/03/18	revised [redacted] subpoenas with revised [redacted] and notice to [redacted] coordinate with [redacted] to get deposition locations for [redacted].	5.30
04/05/18	Correspondence with [redacted] re [redacted]	.20
04/09/18	Correspondence with [redacted] re [redacted] subpoenas	.30
04/10/18	Correspondence with [redacted] re [redacted]	.10
04/11/18	Revisions to [redacted] subpoenas and notice to [redacted], coordinate with [redacted] re [redacted].	1.90
05/03/18	Draft Stipulations to take [redacted] depositions of [redacted]	2.30
05/09/18	Review correspondence with counsel from [redacted] (0.2); search and correspondence re [redacted] (0.2)	.40
05/10/18	Coordination with [redacted] re [redacted] deposition of [redacted] re [redacted]	1.90
05/11/18	Revise [redacted] deposition subpoena, coordinate with [redacted] paralegal re [redacted], get new subpoena served on to [redacted]	3.40
05/21/18	Correspondence with counsel re [redacted]	.20
05/23/18	Correspondence with [redacted] and [redacted] re [redacted] to obtain [redacted]	.30
07/23/18	Draft depo notice to Defs' Expert [redacted], update certificate of service, serve to all counsel	1.10
07/24/18	revisions to [redacted] depo notice, update cos, serve amended notice to all counsel	.30
07/27/18	coordinate with [redacted] re [redacted]	.20
Total for Draft Discovery Requests		47.10

Investigation/Factual Research

03/01/17	Conduct research regarding [redacted]	5.10
03/24/17	Create list of all the case numbers related to this case (1.0). Review past orders re [redacted] (2.0).	3.00
04/04/18	Review rules re [redacted] to the [redacted] and coordinate with [redacted] to have [redacted] delivered to [redacted] before the deadline	1.10
07/25/18	Search [redacted] calendar for [redacted] search for [redacted] order setting [redacted]	.20
01/10/19	[redacted] [redacted] in [redacted] circuit	.40
01/16/19	review order and calendar new claims deadline, compliance hearing date and status report	.20
02/11/19	create list of all [redacted] [redacted] with each [redacted] review order re [redacted] [redacted]	1.10
Total for Investigation/Factual Research		11.10

Litigation Strategy Analysis

05/09/17	Draft class rep case update letter	.50
12/20/17	Weekly Co-Lead Call	.40
01/03/18	Co-Lead conf. call re claim extension deadline and renewed class certification hearing.	1.10
06/20/18	Co-lead call	.40
07/03/18	Calendar internal deadline to response to letter from Kessler re [REDACTED]	.10
07/12/18	correspondence with counsel re [REDACTED], create zip file and download link to send to [REDACTED] for review	1.10
09/05/18	team meeting re [REDACTED] and [REDACTED]	.30
09/10/18	print chambers copies for YGR of [REDACTED] and [REDACTED], fedex to court	2.90
10/31/18	Review memo re [REDACTED], calendar response deadlines and [REDACTED] Westerfield recommendation date	.20
11/14/18	review correspondence to citibank re [REDACTED]	.10
Total for Litigation Strategy Analysis		7.10

Pleadings, Briefs, Pretrial Motion

05/30/17	Draft Motion for Issuance of Letter Rogatory	2.00
06/13/17	Draft Administrative Motion to File Under Seal, Lambrinos Declaration, and Proposed Order	2.60
06/28/17	Review and revisions to Motion for Issuance of Letters Rogatory, Lambrinos Declaration, Proposed Order, Request for Judicial Assistance, and Motion to Seal (3.8); Cite Check (0.3); Highlight and finalize exhibits for filing (0.6)	4.70
06/29/17	Review and make revisions to Letters Rogatory docs and prepare for filing (1.1); file documents and send word versions of proposed order to [REDACTED] and [REDACTED] (0.3); Prepare chambers copies (0.2); Prepare COS and send sealed Exhibit 3 to all counsel (0.2)	1.80
07/20/17	Review Order Denying Admin Mtn to Seal docs related to [REDACTED] [REDACTED] review local rules and re-file unredacted version of Exhibit [REDACTED]	1.00
07/21/17	Create cover sheet for Exhibit [REDACTED] re-file document with cover sheet, send chambers copy to [REDACTED]	.50
08/18/17	Create a draft of IPPs' Motion for Final Approval of Class Action Settlements with Hitachi Maxell, NEC, and LG Chem	2.90
08/22/17	Create drafts of Williams Declaration ISO Mtn for Final Approval, Proposed Order, Proposed Judgment, Sipree Declaration, Gilardi Declaration, and Omnibus Response to Objections	6.90
08/24/17	Manually enter redlines to IPPs' Motion for Final Approval brief, Williams Declaration, Proposed Order, and Proposed Judgment of Dismissal (4.7); Record all page lengths of all objections filed in opposition to [REDACTED] (0.4)	5.10
08/25/17	Motion for Final Approval - search for and prepare potential exhibits re [REDACTED] (1.2); search polyurethane docket re [REDACTED] (0.9); Prepare all [REDACTED] as exhibits (0.7); revisions to Omnibus responses to objections and Williams declaration (3.9)	6.70
08/28/17	Revisions to Motion for Final Approval, Williams Declaration and exhibits, Proposed Order, Proposed Judgment, Omnibus Responses to Objections, Vasquez Declaration, and Mendelson Declaration to prepare for filing.	10.80
08/29/17	Prepare chambers copies to be delivered to [REDACTED] and coordinate with [REDACTED] re [REDACTED]	1.40

11/16/17	Draft and file stipulation re [REDACTED]	2.90
11/20/17	Draft IPP Reply to Tokin Opposition, Draft Williams Declaration, Draft Motion to seal, prepare exhibits to be attached, cite check and search for documents associated with defendants collusive meetings	8.90
11/21/17	edits to IPP Reply brief to Tokin Opposition, edits to Notice of Intention to seal, edits to Williams declaration, finalize all documents and prepare for filing.	6.80
12/20/17	Create word/working version of NEC settlement agreement and send to [REDACTED]	1.70
03/27/18	Pull all relevant docs together and sort in reverse chronological order to create [REDACTED]	3.70
03/28/18	Add docs to supplemental excerpts of record, create index of [REDACTED]	4.90
03/29/18	Combine all relevant documents to create supplemental excerpts of record, bates stamp all the pages, and separate into volumes of less than 300 pages, update index to include bates range of each individual document	7.90
03/30/18	Review citations in Answering Appellee brief and make sure every relevant citation is included in the supplemental excerpts of record ("SER"), add documents to the SER and update bates range, revisions to answering brief to update citations to replace MDL docket number with bates numbers from SER	7.60
04/02/18	Revise Appellee Answering Brief with updated citations, add new doc to supplemental excerpts of record, re-do bates numbering, update index, prepare for filing, file brief and supp. excerpts of record, create paper copies and sharefile link to send to [REDACTED]	9.40
04/03/18	[REDACTED] (0.2); review rules re [REDACTED] cases (0.3); revise answering brief to [REDACTED] and send to [REDACTED] (2.2)	2.70
04/20/18	Review request to extend briefing schedule for [REDACTED], calendar new dates	.40
06/27/18	Review appendices [REDACTED] and research re [REDACTED]	5.60
07/25/18	correspondence re [REDACTED] draft stip re [REDACTED] and revisions re [REDACTED]	1.60
07/27/18	Review draft stipulation and proposed order re [REDACTED] and [REDACTED], compare to [REDACTED]	.90
07/31/18	create folder of all [REDACTED] and [REDACTED] re [REDACTED] for [REDACTED] to review for [REDACTED]	1.30
08/01/18	Create binder of all [REDACTED] materials for [REDACTED] to review for [REDACTED] (1.6)	1.60
08/06/18	Draft admin mtn to seal, zapala decl, and proposed order for Haider daubert mtn	3.90
08/07/18	revisions to mtn to seal, zapala decl, and proposed order	1.30
08/08/18	review draft [REDACTED] mtn re [REDACTED] and start pulling potential exhibits to be attached to zapala declaration (2.3); mtg with TPP, MFR, and AJZ re [REDACTED] (0.4); revisions to zapala declaration (0.6)	3.30
08/09/18	Revisions to zapala decl ISO [REDACTED] admin mtn to seal, zapala decl. ISO mtn to seal, proposed order re mtn to seal (6.7); draft proposed order granting [REDACTED] (0.7)	7.40
08/10/18	Highlight excerpts of [REDACTED] and [REDACTED] to be included as exhibits (2.3) revisions to [REDACTED], mtn to seal, zapala decl. iso mtn to seal, proposed order re mtn to seal (5.6); apply redactions to [REDACTED] (0.6); file all documents (0.5)	9.00
08/13/18	Print YGR chambers copies and underseal filings to be sent to the court	3.00

09/05/18	draft motion to seal, zapala declaration in support of motion to seal, and proposed order re same (3.6); Pull all potential exhibits, revisions to potential exhibit [REDACTED] (2.1)	5.70
09/06/18	draft zapala declaration in support of opposition, review all citations and pull potential exhibits, revisions to depo transcripts	6.90
09/07/18	revisions to opposition to MSJ, zalapa declaration, motion to seal, zapala declaration in support of motion to seal, proposed order re same, and exhibits, redact documents, file all documents, serve under seal documents to counsel	9.80
09/17/18	revisions to supporting separate statement, draft admin motion to seal, ram declaration, and proposed order, file corrected separate statement and motion to seal, serve under seal version to [REDACTED] email proposed order to YGR, prepare chambers copies to be delivered to court	3.90
10/04/18	draft sealing motion, zapala declaration, and proposed order for reply to [REDACTED]	5.20
10/05/18	Revisions to [REDACTED] with declaration and proposed order, file documents and serve to [REDACTED]	8.90
10/08/18	prepare chambers copies of filing to be sent to the court	1.80
Total for Pleadings, Briefs, Pretrial Motion		184.40

Review Plead./Brief/Disc./Mot

03/13/17	Search for order in other case regarding [REDACTED].	3.20
04/17/17	Run searches through all the [REDACTED] re [REDACTED] and search for any [REDACTED] that show which [REDACTED]	3.90
06/02/17	Review Microsoft Mtn for [REDACTED] and all related docs.	1.20
06/08/17	Review Christopher Andrews Second and Third Supplemental Objections	1.20
06/16/17	Review Order Granting Motion for [REDACTED] by Microsoft	.30
07/05/17	Search for scheduling order re Christopher Andrews & Patrick Sweeney Appeals in Ninth Circuit	.50
07/07/17	Search for orders in other cases ([REDACTED]) re [REDACTED]	.80
08/21/17	Create chart of all the [REDACTED] in the case, when the [REDACTED] were filed, and which were on [REDACTED] Include additional information on the notes re objections	4.80
08/23/17	Review hearing transcripts and declarations for information re [REDACTED] (1.9); gather all objections re [REDACTED] (0.3)	2.10
09/19/17	review [REDACTED] order and attachments	.60
05/01/18	Review Order re [REDACTED] calendar new [REDACTED] hearing date and deadline to file status [REDACTED]	.30
05/04/18	Review [REDACTED] letter brief re [REDACTED] and calendar [REDACTED] hearing date (0.4); Review Panasonic Mtn for Relief from Nondispositive pretrial order re [REDACTED] [REDACTED] calendar response deadline date (1.4)	1.80
05/11/18	Review status report re settlements (0.4); review response to order [REDACTED] by [REDACTED] (0.3)	.70
05/17/18	Review orders and judgment re DPPs Final Approval Motion and Motion for Attorney's Fees	.40
05/21/18	Review Opposition to Panasonic's Motion for Relief	.30
05/23/18	Create binder of all [REDACTED]	2.30
05/31/18	Review order on stipulation re expert depositions and calendar deposition dates	.30

07/02/18	Review order re report and recommendation re Rinis Travel Service	.20
07/10/18	Review order re compliance hearing and update case calendar with new deadlines	.10
07/19/18	review order and calendar new compliance hearing date and end of claims period	.10
08/13/18	Create binders of [REDACTED] [REDACTED], and [REDACTED]	6.80
08/15/18	Review re [REDACTED] (2.7); review status report re [REDACTED] (0.3); review re [REDACTED] (2.8)	5.80
08/17/18	review correspondence re [REDACTED] (0.2); correspondence with counsel re [REDACTED] (0.3); calendar opposition and reply deadlines for [REDACTED] [REDACTED] (0.1); create binder of [REDACTED] to review (4.2); review all filed declarations in support of motion to seal (0.7); forward [REDACTED] for review (0.3)	5.80
08/20/18	Review order and calendar new compliance hearing date and status statement (0.1)	.50
08/21/18	Create binder of relevant materials ([REDACTED]) for AJT to review (3.9); review re [REDACTED] (1.2)	5.10
08/22/18	review decl. in support of mtn to seal class cert	.10
08/24/18	review re opp to defs' mtn to expedite	.30
08/28/18	review reply brief re [REDACTED]	1.10
09/05/18	Review order and amended order re Defs' Motion to Strike, [REDACTED]	.60
10/01/18	review and send all [REDACTED] to AJZ for review	.30
10/08/18	review stip and proposed order re [REDACTED]	.30
10/30/18	search for all documents related to [REDACTED] [REDACTED], send to [REDACTED]	.20
11/01/18	review mediation statement before [REDACTED]	.30
11/05/18	review order and calendar new compliance hearing date and status statement deadline (0.2); calendar teleconference with YGR and dial-in (0.1)	.30
11/06/18	review memo to [REDACTED], calendar deadlines	.40
11/27/18	review order and update case calendar re new hearing dates	.20
11/28/18	review re [REDACTED] and calendar Oral Arguments dates	.30
12/20/18	review status report re settlements	.10
12/26/18	review scheduling order and update case calendar (0.1); review mtn to consolidate filed in 9th circuit (0.1)	.20
01/23/19	review order and calendar new dates re arbitration	.10
01/24/19	review motion to direct notice class re settlements	.20
01/28/19	review motion to direct notice class re settlements, calendar opp and reply deadlines	.30
01/29/19	review order filed in [REDACTED] (0.1); review orders denying motions as moot (0.2)	.30
01/30/19	review order denying MSJ as moot	.10
02/01/19	review order re [REDACTED]	.20
02/08/19	review motion to consolidate case filed by [REDACTED]	.20
02/20/19	review order re granting motion to consolidate in [REDACTED]	.10
02/25/19	review Toshiba's CAFA notice	.30

	Total for Pleadings, Briefs, Pretrial Motion	8.00
	Total for Reid Gaa	8.00
Steven Williams		
Class Certification		
04/13/17	T/c R. Saveri re [REDACTED]	.50
05/09/17	Prepare for and t/c co-counsel and experts re [REDACTED]	1.00
06/01/17	Prepare for and t/c co-counsel and experts re [REDACTED]	1.00
06/06/17	T/c co-counsel re status of [REDACTED]	.50
06/22/17	Prepare for and t/c experts and co-counsel re [REDACTED]	1.00
09/15/17	Prepare for and t/c experts re [REDACTED]	1.50
10/13/17	Prepare for and t/c experts; t/c VRW re [REDACTED] f/u Trump Alioto re [REDACTED]	1.80
	Total for Class Certification	7.30
Court Appearances & Prep		
07/12/17	T/c co-lead counsel re [REDACTED]	.50
07/14/17	Prepare for and attend status conference; c/NEC Tokin and SDI re [REDACTED] travel to Oakland and return	3.00
	Total for Court Appearances & Prep	3.50
Investigation/Factual Research		
09/14/17	settlement discussion [REDACTED], correspondence co-counsel	.80
10/09/17	Correspondence re [REDACTED]	.50
	Total for Investigation/Factual Research	1.30
Litigation Strategy Analysis		
03/01/17	T/c co-leads re [REDACTED]; follow up review of [REDACTED] [REDACTED]; prepare for Samsung mediation	1.50
10/11/17	Correspondence co-counsel and experts re [REDACTED]; correspondence re [REDACTED] [REDACTED]; t/c J. Walker re [REDACTED]	2.30
10/20/17	Analysis of claims against [REDACTED]	1.00
	Total for Litigation Strategy Analysis	4.80
Pleadings, Briefs, Pretrial Motion		
05/18/17	Prepare for and t/c co-leads re [REDACTED]	1.00
05/23/17	Prepare supporting papers for motion to reimburse litigation expenses and for attorneys' fees	5.50
05/24/17	Preparation of supporting papers for motion for reimbursement of litigation expenses and for attorneys fees	3.50

05/25/17	Review, revisions, preparation of motion for reimbursement of litigation expenses and attorneys' fees	5.50
07/06/17	T/cs co-counsel and defense counsel re [REDACTED], review and revisions to [REDACTED]	2.50
07/07/17	Prepare for and file cmc statement; meet and confers with defendants and DPPs re [REDACTED]	1.50
08/20/17	Review and analysis of draft leamer declaration	1.50
08/21/17	Review, analysis and revisions to motion for final approval; t/c vrw re [REDACTED]	1.80
08/26/17	Review and analysis of draft motion for final approval	1.00
08/27/17	Review and analysis of revised final approval briefs	1.00
09/23/17	Review, analysis and revisions to class cert brief and expert report	2.50
10/14/17	Review, analysis of draft supplemental submission and correspondence re [REDACTED]	.50
	Total for Pleadings, Briefs, Pretrial Motion	27.80
Review Plead./Brief/Disc./Mot		
03/08/17	Review and analysis of draft supplemental preliminary approval papers	.50
	Total for Review Plead./Brief/Disc./Mot	.50
Settlement		
03/05/17	Prepare for SDI mediation	1.00
03/06/17	Prepare for and attend sdi mediation, travel to sf and return	9.80
03/15/17	T/c Judge Walker re [REDACTED]; t/c LCHB re [REDACTED]	.80
03/20/17	Review and analysis of court orders re [REDACTED]	.50
05/31/17	T/c counsel for SDI re [REDACTED] (.5); correspondence and t/c co-counsel re [REDACTED] (.5)	1.00
06/16/17	T/c J. Roberti re [REDACTED]	.50
08/17/17	T/c VRW re [REDACTED], correspondence co-counsel re [REDACTED]	.50
08/28/17	Review, analysis, revisions and filing final approval motion and response to objections (5.5); t/c NEC Tokin re [REDACTED] (.5)	6.00
10/04/17	Correspondence SDI re settlement negotiations	.50
10/05/17	[REDACTED]	.50
10/12/17	Prepare for and mediation with SDI, travel to SF and return	9.70
10/17/17	T/c VRW and co-counsel re [REDACTED] t/c T. Nicoud re [REDACTED]	1.00
10/30/17	T/c T. Nicoud re [REDACTED]; t/c B. Glackin re [REDACTED]	1.50
	Total for Settlement	33.30
Trial Prep & Trial		
06/30/17	Prepare for and meet and confer with defendants re case management conference, class certification schedule, and trial schedule	1.00
	Total for Trial Prep & Trial	1.00

		Total for Steven Williams	79.50
Tamarah Prevost			
Class Certification			
01/12/18	Attended class certification hearing.		5.10
		Total for Class Certification	5.10
Court Appearances & Prep			
07/26/18	Drafted letter to the court and stipulation [REDACTED]		2.10
		Total for Court Appearances & Prep	2.10
Discovery Meet & Confer			
12/20/17	Attended co-lead plaintiffs' call.		1.50
01/04/18	Attended weekly co-Plaintiff call.		1.30
01/10/18	Call with other co-lead Plaintiffs		.90
01/24/18	Call with co-counsel re [REDACTED]		1.90
03/14/18	Co-lead call, drafted memo to AJZ of same		1.60
03/26/18	Call with co-counsel regarding [REDACTED]		.60
06/06/18	Co-lead call with lead plaintiffs.		.40
06/13/18	Attended co-lead call with other IPPs.		.30
		Total for Discovery Meet & Confer	8.50
Investigation/Factual Research			
01/24/18	Drafting of the appellate brief responding to objectors to settlement.		.90
		Total for Investigation/Factual Research	.90
Litigation Strategy Analysis			
12/13/17	Weekly call with co-counsel.		.60
05/30/18	Call with co-counsel regarding [REDACTED] and [REDACTED].		1.10
07/11/18	Participated in weekly co-lead call		1.10
07/18/18	Weekly co-lead call		1.20
07/25/18	Co-lead call with counsel		1.20
07/27/18	Conferred with opposing counsel and finalized [REDACTED]		1.20
07/30/18	Call regarding preliminary approval motion		.90
08/01/18	Co-Lead Call		1.10
03/06/19	Co-lead call		.70
		Total for Litigation Strategy Analysis	9.10

Pleadings, Briefs, Pretrial Motion

01/22/18	Legal research regarding [REDACTED] settlement.	1.60
03/19/18	[REDACTED] responsive brief to appellant's objection brief	.90
03/20/18	Drafted responsive brief to appellant's objection brief	2.50
03/21/18	Drafted response to objector's appellate brief	4.90
03/22/18	Drafted response to objector's appellate brief.	2.40
03/29/18	Revised and proofread Andrews' appellant response brief	4.30
06/18/18	Conference call with co-counsel and expert Leamer regarding [REDACTED].	1.30
06/20/18	Co-lead call with IPP counsel regarding [REDACTED]	.90
07/06/18	Drafted MSJ pre-filing letter	1.30
07/26/18	Call with experts re Haider deposition and daubert motion	2.20
07/31/18	Drafted Daubert motion against Dr. Laila Haider	2.30
08/01/18	Drafted Daubert motion against Dr. Laila Haider	4.30
08/02/18	Drafted Daubert motion against Dr. Laila Haider	6.30
08/03/18	Drafted and finalized Daubert motion	6.90
08/06/18	Call with expert Ed Leamer regarding Daubert motion	2.40
08/08/18	Drafted and finalized Daubert motion	12.30
12/12/18	Call with SDI regarding preliminary approval motion	.80
Total for Pleadings, Briefs, Pretrial Motion		57.60

Review Plead./Brief/Disc./Mot

06/27/18	Revised and finalized expert rebuttal reports	2.50
06/29/18	Revised and approved expert rebuttal reports	.90
Total for Review Plead./Brief/Disc./Mot		3.40

Settlement

12/20/17	Drafted/revised settlement agreement for NEC Tokin Corp.	1.90
07/03/18	Coordinated a response amongst the proposed class representatives to Kessler's settlement demand.	1.10
07/16/18	Drafted letter to Kessler on behalf of all plaintiffs, in response to demand letter	1.20
07/21/18	Corresponded with co-counsel regarding [REDACTED]	1.10
07/23/18	Coordinated and finalized letters going out to all class reps regarding [REDACTED]	1.40
07/25/18	Call with Lesley weaver re: [REDACTED]	.90
07/27/18	Spoke with liaison counsel Ken Mann regarding [REDACTED]	1.30
12/12/18	Call with co-lead counsel regarding [REDACTED]	.50
01/22/19	Revised motion for preliminary approval of class action settlement.	1.20

		Total for Settlement	10.60
Trial Prep & Trial			
10/23/18	Conferred with co-counsel regarding [REDACTED].		.90
10/25/18	Call with co-counsel regarding [REDACTED].		.80
11/07/18	Call with co-counsel regarding [REDACTED].		1.10
		Total for Trial Prep & Trial	2.80
		Total for Tamarah Prevost	100.10
Tracy Lee			
Discovery-Doc Review			
03/01/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/02/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/03/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/06/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/07/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/08/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/09/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/10/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/13/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/20/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/21/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/22/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/23/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/24/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/27/17	Review documents for H Shimokomaki (Sanyo) deposition; revise translation exhibits for A Kim (LGC) deposition.		8.00
03/28/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/29/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
03/30/17	Review documents and revise translation exhibits for H Shimokomaki (Sanyo) deposition.		8.00
03/31/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
04/03/17	Review documents and revise translation exhibits for H Shimokomaki (Sanyo) deposition.		8.00
04/04/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
04/05/17	Review documents for H Shimokomaki (Sanyo) deposition.		8.00
04/06/17	Review documents and revise translation exhibits for H Shimokomaki (Sanyo) deposition.		8.00

04/07/17	Review documents for H Shimokomaki (Sanyo) deposition.	8.00
04/08/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
04/10/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
04/11/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
04/12/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
04/13/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
04/14/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
04/17/17	Review documents for H Shimokomaki (Sanyo) deposition.	8.00
04/18/17	Review documents for H Shimokomaki (Sanyo) deposition.	8.00
04/19/17	Review documents for H Shimokomaki (Sanyo) deposition.	8.00
04/20/17	Review documents for H Shimokomaki (Sanyo) deposition.	8.00
04/21/17	Review documents for H Shimokomaki (Sanyo) deposition.	8.00
04/24/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
04/25/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
04/26/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
04/27/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
04/28/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
05/01/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
05/02/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
05/03/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
05/04/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
05/05/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
05/08/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
05/09/17	Review documents for H Shimokomaki (Sanyo) deposition	8.00
05/10/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED] (Sanyo).	8.00
05/11/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED] (Sanyo).	8.00
05/12/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED] (Sanyo).	8.00
05/15/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED] (Sanyo)	8.00
05/16/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED] (Panasonic)	8.00
05/17/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED] (Panasonic)	8.00
05/18/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED] (SDI and LGC)	8.00
05/19/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED] (LGC)	8.00
05/22/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED]. (LGC)	8.00
05/23/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED]. (LGC)	8.00
05/24/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED]. (LGC)	8.00
05/25/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED]. (LGC)	8.00

05/26/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED]. (LGC)	8.00
05/30/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED]. (LGC)	8.00
05/31/17	Review documents [REDACTED] than [REDACTED] for [REDACTED] and [REDACTED]. (LGC)	8.00
06/01/17	Review "[REDACTED]" documents. (Hitachi Maxell and LGC)	8.00
06/02/17	Review "[REDACTED]" documents. (LGC)	8.00
06/05/17	Review "[REDACTED]" documents (LGC); find supporting documents to subpoena [REDACTED] documents	8.00
06/06/17	Review "[REDACTED]" documents (LGC).	8.00
06/07/17	Find supporting documents to [REDACTED] documents	8.00
06/08/17	Find supporting documents to [REDACTED] documents	8.00
06/09/17	Review "[REDACTED]" documents. (LGC)	8.00
06/12/17	Review "[REDACTED]" documents (LGC); review supporting documents to [REDACTED] documents.	8.00
06/13/17	Review supporting documents to [REDACTED] documents.	8.00
06/14/17	Informally translate supporting documents to [REDACTED] documents.	8.00
06/15/17	Informally translate supporting documents to [REDACTED] documents; review "price [REDACTED]" documents. (LGC)	8.00
06/16/17	Review "[REDACTED]" documents. (LGC)	8.00
06/19/17	Review "[REDACTED]" documents (LGC).	8.00
06/20/17	Review "[REDACTED]" documents (LGC).	8.00
06/21/17	Review "[REDACTED]" documents (LGC).	8.00
06/22/17	Review "[REDACTED]" documents (Panasonic).	4.00
06/23/17	Review "[REDACTED]" documents (Panasonic).	6.00
06/26/17	Review "[REDACTED]" documents. (Panasonic)	8.00
06/27/17	Search and review documents related to M Niko and Hikita (Panasonic) for [REDACTED] [REDACTED] review documents of T Mino (Sanyo/Panasonic) for [REDACTED].	8.00
06/28/17	Compile potential [REDACTED] for M Honma. (Sanyo)	8.00
06/29/17	Review documents of T Mino (Sanyo/Panasonic) for [REDACTED]	8.00
07/02/17	Search and review documents for [REDACTED] related to M Honma. (Sanyo)	5.00
07/03/17	Search and review documents for [REDACTED] related to M Honma (Sanyo)	8.00
07/05/17	Search and review documents for [REDACTED] related to M Honma (Sanyo)	8.00
07/06/17	Informally translate potential deposition exhibits for M Honma (Sanyo)	8.00
07/07/17	Search and review documents for [REDACTED] related to M Honma (Sanyo)	5.00
07/08/17	Search and review documents for [REDACTED] related to M Honma (Sanyo)	3.00
07/10/17	Search and review documents for [REDACTED] related to M Honma. (Sanyo)	8.00

07/11/17	Search and review work duties documents for M Niko. (Panasonic)	8.00
07/12/17	Search and review relevant documents for Hikita.	8.00
07/17/17	Search and review documents for ██████████ related to M Niko. (Panasonic)	8.00
07/19/17	Translation for K Hikita (Panasonic) and revise translation for ██████████ documents for Panasonic/Sanyo.	8.00
07/20/17	Search and review relevant documents for M Asai. (Pana/Sanyo)	8.00
07/21/17	Search and review relevant documents for M Asai. (Pana/Sanyo)	8.00
07/22/17	Search and review relevant documents for M Asai. (Pana/Sanyo)	3.00
07/24/17	Search and review relevant documents for M. Asai. (Pana/Sanyo)	8.00
07/25/17	Search and review relevant documents for M. Asai. (Pana/Sanyo)	8.00
07/26/17	Search and review relevant documents for M. Asai. (Pana/Sanyo)	8.00
07/27/17	Search and review relevant documents for M. Asai. (Pana/Sanyo)	8.00
07/28/17	Search and review relevant documents for M. Asai. (Pana/Sanyo)	5.00
07/30/17	Search and review relevant documents for M Niko. (Panasonic)	3.00
07/31/17	Search and review relevant documents for M Niko. (Pana/Sanyo)	8.00
08/01/17	Search and review relevant documents for M Niko. (Pana/Sanyo)	8.00
08/02/17	Search and review relevant documents for M Niko. (Pana/Sanyo)	7.00
08/03/17	Search and review relevant documents for M Niko. (Pana/Sanyo)	7.00
08/07/17	Search and review relevant documents for M Niko. (Pana/Sanyo)	8.00
08/08/17	Search and review relevant documents for M Niko. (Pana/Sanyo)	8.00
08/09/17	Search and review relevant documents for M Niko. (Pana/Sanyo)	8.00
08/14/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/15/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/16/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/17/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/18/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/21/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/22/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/23/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/24/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/25/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/28/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/29/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/30/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
08/31/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/01/17	Search and review relevant documents for M Niko. (Panasonic)	8.00

09/05/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/06/17	Search and review relevant documents for M Niko (Panasonic); revise translated exhibits for class certification against Packers.	8.00
09/07/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/11/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/12/17	Search and review relevant documents for M Niko (Panasonic); revise translated exhibits for M Niko deposition.	8.00
09/13/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/14/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/15/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/18/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/19/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/20/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/21/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/22/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/25/17	Revise translated exhibits for M Niko (Panasonic) deposition; search and review relevant documents for M Niko. (Panasonic)	8.00
09/26/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/27/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/28/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
09/29/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
10/02/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
10/03/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
10/04/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
10/05/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
10/06/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
10/09/17	Search and review relevant documents and revise translate exhibits for M Niko deposition. (Panasonic)	8.00
10/10/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
10/11/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
10/12/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
10/13/17	Search and review relevant documents for M Niko. (Panasonic)	8.00
10/16/17	Search and review relevant documents for M Niko deposition (Panasonic)	8.00
10/17/17	Search and review relevant documents for M Niko deposition (Panasonic)	8.00
10/18/17	Search and review relevant documents for M Niko deposition (Panasonic)	8.00
	Total for Discovery-Doc Review	1216.00
	Total for Tracy Lee	1216.00

Grand Total 2642.60

EXHIBIT F

Cotchett, Pitre & McCarthy, LLP**In re Lithium Ion Batteries****Litigation Costs****June 1, 2013 - Present**

CATEGORY	AMOUNT INCURRED
Court Costs	\$ 7,875.00
Experts/consultants	\$ -
Online document database	\$ -
Federal Express	\$ 2,345.82
Hearing Transcripts	\$ 548.25
Investigation	\$ -
Lexis/westlaw	\$ 5,666.27
Messenger/delivery	\$ 487.66
Photocopies - In-House	\$ 26,179.60
Photocopies - Outside	\$ -
Postage	\$ 88.31
Service of Process	\$ 2,371.75
Special Supplies	\$ -
Telephone/telecopier	\$ 6,747.75
Travel	\$ 15,058.04
Miscellaneous	\$ 3,981.29
TOTAL:	\$ 71,349.74