

EXHIBIT 24

1 *Counsel for Indirect Purchaser Plaintiffs*

2

3

4

5

6

7

8

9

10

11

UNITED STATES DISTRICT COURT

12

NORTHERN DISTRICT OF CALIFORNIA

13

OAKLAND DIVISION

14

15

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

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

16

MDL NO. 2420

17

18

**DECLARATION OF CASEY L. LOTT IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES ON
BEHALF OF LANGSTON & LOTT**

19

This Document Relates to:

20

ALL INDIRECT PURCHASER ACTIONS

21

22

23

24

25

26

27

28

1 I, Casey L. Lott, declare:

2 1. I am shareholder and managing partner of Langston & Lott, Counsel for Indirect
3 Purchaser Plaintiffs (“IPPs” or “Plaintiffs”) in this action. I submit this declaration in support of
4 IPPs’ Motion for an Award of Attorneys’ Fees and Reimbursement of Expenses. I make this
5 declaration based on my personal knowledge and if called as a witness, I could and would
6 competently testify to the matters stated herein.

7 2. My firm has served as counsel to Maury Kim Billingsley and as counsel for IPPs
8 throughout the course of this litigation. The background and experience of Langston & Lott and its
9 attorneys are summarized in the curriculum vitae attached hereto as Exhibit A.

10 3. Casey L. Lott has prosecuted this litigation solely on a contingent-fee basis, and has
11 been at risk that it would not receive any compensation for prosecuting claims against the
12 defendants. While Langston & Lott devoted its time and resources to this matter, it has foregone
13 other legal work for which it would have been compensated.

14 4. During the pendency of the litigation, Langston & Lott performed the following
15 work: Met with class representative and provided representative with updates on the status of the
16 litigation, met with class representative to assist with preparation of discovery responses, and
17 helped prepare class representative for his deposition.

18 5. Attached hereto as Exhibit B is a billing summary of Langston & Lott’s total hours
19 and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel
20 for Plaintiffs are not seeking attorneys’ fees for any time billed prior to the appointment of lead
21 counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by
22 Langston & Lott during this period of time was 19.70 hours, with a corresponding lodestar based
23 on current rates of \$13,790.00. The lodestar amount reflected in Exhibit B is for work assigned by
24 Lead Counsel, and was performed by professional staff at my law firm. This summary was
25 prepared from contemporaneous, daily time records regularly prepared and maintained by
26 Langston & Lott.

27

28
DECLARATION OF CASEY L. LOTT IN SUPPORT OF IPPS’ MOTION FOR AN AWARD
OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF
LANGSTON & LOTT; Case No. 13-md-02420-YGR (DMR)

1 6. Attached hereto as **Exhibit C** is a list of the various billing rates each attorney and
2 staff member at my firm has billed at in this case.

3 7. Attached hereto as **Exhibit D** is a compilation of my firm's detailed records at
4 historical billing rates. The entries in **Exhibit D** have been redacted per the Court's Order in ECF
5 No. 1803.

6 8. Langston & Lott is not seeking any expense reimbursement.

7 9. I have reviewed the time and expenses reported by Langston & Lott in this case
8 which are included in this declaration, and I affirm that they are true and accurate.

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

11 Executed on May 23, 2017 at Booneville, Mississippi.

12

13

/s/ Casey L. Lott

14

Casey L. Lott

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION

I, Steven N. Williams, hereby attest, pursuant to United States District Court, Northern District of California Civil Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from the signatory hereto.

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

EXHIBIT A

CIRRICULUM VITAE

CASEY L. LOTT, ESQ.

Address: Langston & Lott
100 South Main Street
Post Office Box 382
Booneville, MS 38829-0382

Telephone: (662) 728-9733

Facsimile: (662) 728-1992

Email: clott@langstonlott.com

Website: www.langstonlott.com

EXPERTISE:

- Mass Tort
 - Class Action
 - Personal Injury/Wrongful Death
 - Product Liability
-

PROFESSIONAL SUMMARY

Mr. Lott is a trial lawyer, shareholder and Managing Partner at Langston & Lott, Attorneys at Law, PLLC in Booneville, Mississippi. Mr. Lott is a fourth generation attorney who works alongside his father, Duncan Lott, in the firm his grandfather established in 1964.

Langston & Lott has fifty years of experience successfully litigating on behalf of its clients. With a focus on mass tort, catastrophic personal injury,

wrongful death and products liability litigation, Langston & Lott enjoys a well-earned reputation as one of the state's most successful litigation firms.

Our firm has held leadership positions in national class actions such as the HMO (litigation coordinator) and Sulzer Hip Implant (resolution counsel) litigation. Langston & Lott has also been involved in many other large class action and mass tort cases ranging from asbestos to tobacco to pharmaceuticals to HMO and most recently, the BP Litigation.

Following the *Deepwater Horizon* disaster in April, 2010, Langston & Lott partnered with Faegre Baker Daniels in Minneapolis, Minnesota¹ to represent commercial fishermen who suffered economic damage from the oil spill. This team opened offices in Bayou La Batre, Alabama; Biloxi, Mississippi and New Orleans, Louisiana dedicated solely to prosecuting claims for commercial fishermen. Langston & Lott presently represents approximately 2,000 commercial seafood clients. This client base represents approximately one-third of the federally permitted (EEZ) fishermen in Gulf Coast Area (as defined by the settlement) and close to 60% of commercial shrimpers and oystermen in Mississippi. Other than members of the PSC, the Langston & Lott team of attorneys was the only group of plaintiff attorneys asked by Judge Barbier to speak in support of the settlement at the Fairness Hearing.

Langston & Lott was also one of the firms represented on the Plaintiffs Steering Committee in the Bausch & Lomb ReNu with Moisture Loc MDL centralized in South Carolina. Mr. Lott served on the Discovery Committee in that litigation.

In 2013, Casey Lott was appointed Chairman of the State Liaison Committee in *In Re Blue Cross Blue Shield Antitrust Litigation*, MDL 2406.

In 2014, Casey Lott was appointed to serve on the Plaintiff Steering Committee in the *Lipitor Products Liability Litigation*, MDL 2502.

Mr. Lott also accepts a number of *pro bono* cases each year for clients with worthy causes, but no resources to pay an attorney.

HONORS

¹ Faegre Baker Daniels served as Lead Counsel for the commercial fishermen in the *Exxon Valdez* litigation.

- Vice President of the Ole Miss student chapter of the Mississippi Association for Justice, 2002 and 2003;
 - President of the Ole Miss student chapter of the Mississippi Association for Justice, 2004;
 - Ole Miss Moot Court Board, 2003 and 2004;
 - “Final Four” placement in the 2003 Moot Court Board Appellate Advocacy Competition at Ole Miss;
 - “Final Four” placement in the 2004 Stein Reynolds Dalephite Trial Advocacy Competition at Ole Miss;
 - One of three students selected to represent Ole Miss in the 2003 National Appellate Advocacy Competition in Atlanta, Georgia;
 - Recipient of the 2004 Francis S. Bowling Scholarship in Law, which is rewarded annually a student who has excelled academically, demonstrated leadership ability and trial advocacy skills.
-

EDUCATION

Mississippi State University
BA, Business Administration
Cum Laude, 2002

University of Mississippi School of Law
Juris Doctorate, 2004

AWARDS/ACHIEVEMENTS

- Recipient of the “Young Lawyer of the Year Award,” Mississippi Association for Justice, 2005-06
- Selected as a Mid-South *SuperLawyers* “Rising Star,” 2011-present
- Selected as one of Mississippi’s Top 40 Lawyers Under 40 by the National Trial Lawyers Association, 2012-present

- Selected as one of Mississippi's 50 Leading Attorneys by the *Mississippi Business Journal*, 2012

PROFESSIONAL ASSOCIATIONS/ACTIVITIES

Member of the Bar in Mississippi and Alabama

Admitted to practice before U. S. Fifth Circuit Court of Appeals, U. S. District Courts, Northern and Southern Districts of Mississippi and Alabama

Member of the Prentiss County Bar - Past President of the Prentiss County Bar

One of 18 attorneys selected by the Mississippi Supreme Court to serve on the Bar's Complaint Tribunal, 2012-present

Active Member of the Mississippi Association for Justice
Board of Governors, 2005-07
Board of Governors, 2013-present

Member American Association for Justice

Board Attorney, Booneville School District, Booneville, Mississippi, 2008-present

City Attorney, Marietta, Mississippi, 2008-present

Member of Booneville Area Chamber of Commerce

Member of the Prentiss County Development Association

COMMUNITY ACTIVITIES

Joe Ray Langston Memorial Scholarships, Northeast Mississippi Community College

Cynthia Anne Langston Memorial Scholarships, Northeast Mississippi Community College

L&L Vest Program - providing bullet-proof vests for local law enforcement

Sponsor of Kid's Town Pavilion in Booneville, Mississippi and numerous other school and college activities

Member of Booneville First United Methodist Church
Finance Committee, 2012-14
Preschool Committee, 2014

EXHIBIT B

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT REPORTED HOURS AND LODESTAR AT CURRENT HOURLY RATES

Reporting Period: June 1, 2013 through February 28, 2014

Harrison & Lott

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

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY	TOTAL LODESTAR	
Casey L. Lott			6.50		1.30		6.30		5.60						19.70	\$700.00	\$13,790.00	
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
	0.00	11.00	6.50	11.00	0.00	1.30	1.30	0.00	5.60	0.00	0.00	0.00	0.00	0.00	19.70		\$13,790.00	
NON-ATTORNEYS																		
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
															0.00	\$0.00	\$0.00	
SUBTOTAL	0.00	0.00	0.00	0.00	0.00	0.00	11.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		\$0.00	
GRAND TOTAL:	0.00	0.00	6.50	0.00	11.00	1.30	6.30	0.00	5.60	0.00	0.00	0.00	0.00	0.00	19.70		\$13,790.00	

EXHIBIT C

EXHIBIT D

(REDACTED)

EXHIBIT D

DETAILED TIME

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION LANGSTON & LOTT								
Date	Name	Title	Firm	Description of Work	Hours	Rate	Total	Task Code
6/28/2013	Casey L. Lott	Attorney	Langston & Lott	Reviewed Protective Order	0.3	\$700.00	\$210.00	7
7/1/2013	Casey L. Lott	Attorney	Langston & Lott	Meeting with [REDACTED] to Review Order & Acknowledgement	0.8	\$700.00	\$560.00	7
7/26/2013	Casey L. Lott	Attorney	Langston & Lott	Reviewed 1st Amended Complaint	1	\$700.00	\$700.00	7
4/8/2014	Casey L. Lott	Attorney	Langston & Lott	Reviewed 2nd Amended Complaint	0.8	\$700.00	\$560.00	7
10/2/2014	Casey L. Lott	Attorney	Langston & Lott	Meeting with [REDACTED] to review and signing of Declaration of of Document Preservation	0.7	\$700.00	\$490.00	7
10/22/2014	Casey L. Lott	Attorney	Langston & Lott	Reviewed 3rd Amended Complaint	0.8	\$700.00	\$560.00	7
3/20/2015	Casey L. Lott	Attorney	Langston & Lott	Reviewed Defendants 1st Set of Discovery to Client	0.7	\$700.00	\$490.00	6
5/11/2015	Casey L. Lott	Attorney	Langston & Lott	Met with [REDACTED] and prepared Response to 1st Set of Discovery	2.2	\$700.00	\$1,540.00	3
5/28/2015	Casey L. Lott	Attorney	Langston & Lott	Reviewed Toshiba Corp. 1st RPD	0.2	\$700.00	\$140.00	9
2/4/2016	Casey L. Lott	Attorney	Langston & Lott	Reviewed Notice of Deposition of [REDACTED]	0.1	\$700.00	\$70.00	9
3/8/2016	Casey L. Lott	Attorney	Langston & Lott	Review Acknowledgement & Agreement to Bound for client to sign	0.7	\$700.00	\$490.00	7
3/18/2016	Casey L. Lott	Attorney	Langston & Lott	Reviewed 4th Amended Complaint	0.7	\$700.00	\$490.00	7
3/18/2016	Casey L. Lott	Attorney	Langston & Lott	Review of Declaration of Document Preparation for [REDACTED] to sign	0.5	\$700.00	\$350.00	7
3/23/2016	Casey L. Lott	Attorney	Langston & Lott	Deposition Preparation	4.3	\$700.00	\$3,010.00	6
3/23/2016	Casey L. Lott	Attorney	Langston & Lott	[REDACTED] Amended and Supplement Response to discovery	0.6	\$700.00	\$420.00	6
4/12/2016	Casey L. Lott	Attorney	Langston & Lott	Review of deposition transcript with [REDACTED]	5.3	\$700.00	\$3,710.00	9
TOTAL							\$13,790.00	
EXPENSES							\$ 13,790.00	
ATTORNEY FEES							\$ -	
TOTAL							\$ 13,790.00	