

EXHIBIT 27

1 *Counsel for Indirect Purchaser Plaintiffs*

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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OAKLAND DIVISION

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

16

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

17

MDL NO. 2420

18

**DECLARATION OF ERIC S. SOMERS IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES ON
BEHALF OF LEXINGTON LAW GROUP**

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This Document Relates to:

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ALL INDIRECT PURCHASER ACTIONS

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1 I, Eric S. Somers, declare:

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

7 2. My firm has served as counsel to current plaintiff Jason Ames, as well as prior
8 plaintiffs Robert Hyams, Matthew Weiner, Wilbur Franklin, Susanne Hiller and Chad Conover,
9 and as counsel for IPPs throughout the course of this litigation. The background and experience of
10 Lexington Law Group and its attorneys are summarized in the curriculum vitae attached hereto as
11 **Exhibit A.**

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

16 4. During the pendency of the litigation, Lexington Law Group performed the
17 following work as to Mr. Ames and the other putative class representatives: explained the nature
18 of the proceedings to the clients; reviewed pleading amendments relating to the clients;
19 coordinated the collection and categorization of product purchase evidence provided by the clients
20 and ensured that all evidence preservation duties were satisfied; assisted the clients in responding
21 to written discovery propounded by the Defendants and later supplementing these responses,
22 including extensive ESI searches requested by Defendants; prepared Mr. Ames for his deposition
23 and first-chaired the defense of that deposition; prepared another class representative for a
24 deposition that was initially requested by Defendants but then cancelled; reviewed proposed
25 settlements to ensure that Plaintiffs understood the agreements and the impact on Mr. Ames and
26 the putative class; and monitored the case proceedings in order to answer questions from Mr.
27 Ames and the clients.

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DECLARATION OF ERIC S. SOMERS IN SUPPORT OF IPPS’ MOTION FOR AN AWARD
OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF
LEXINGTON LAW GROUP; Case No. 13-md-02420-YGR (DMR)

1 5. Attached hereto as **Exhibit B** is a billing summary of Lexington Law Group’s total
2 hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. The
3 total number of hours spent by Lexington Law Group during this period of time was 112.6, with a
4 corresponding lodestar based on current rates of \$68,512. The lodestar amount reflected in
5 Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my
6 law firm. This summary was prepared from contemporaneous, daily time records regularly
7 prepared and maintained by Lexington Law Group.

8 6. Attached hereto as **Exhibit C** is a list of the various billing rates each attorney and
9 staff member at my firm has billed at in this case. Lexington Law Group’s rates have remained
10 the same from November 2012 to February 28, 2017. Thus, for Lexington Law Group, there is no
11 difference between the “historical” and “current” rates at issue in the instant filing.

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

15 8. Attached hereto as **Exhibit E** is a summary of the expenses Lexington Law Group
16 has incurred during the course of this litigation. Lexington Law Group expended a total of \$632.20
17 in unreimbursed costs and expenses in connection with the prosecution of this case. These
18 expenses were incurred on behalf of IPPs by Lexington Law Group on a contingent basis and have
19 not been reimbursed. The expenses reflected in Exhibit E were prepared from expense vouchers
20 and receipts, and thus represent an accurate recordation of the expenses incurred. We have not
21 submitted costs for copy, mail, telephone, or computer expenses associated with the case.

22 9. I have reviewed the time and expenses reported by Lexington Law Group in this
23 case which are included in this declaration, and I affirm that they are true and accurate.

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

3 Executed on May 23, 2017 at San Francisco, California.

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5 */s/ Eric S. Somers*

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Eric S. Somers

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EXHIBIT A



503 DIVISADERO STREET, SAN FRANCISCO, CALIFORNIA 94117-2212
TELEPHONE (415) 913-7800 FACSIMILE (415) 759-4112

MISSION STATEMENT

The Lexington Law Group is a public interest law firm specializing in consumer protection, antitrust and environmental litigation. We bring creativity and tenacity to plaintiff's public interest litigation in a manner that yields superb results for our clients and the general public. Our cases have resulted in the recovery of millions of dollars for the benefit of consumers and the removal of toxic chemicals from thousands of everyday products.

Our firm is made up of committed people who are passionate about our work. We represent aggrieved individuals, non-profit organizations, and public entities. We are dedicated to our clients and the public interest goals that we set for each case. Our exceptional grasp of complex legal issues enables us to obtain extraordinary results for our clients.

We are aggressive litigators who fight for our clients at every turn, yet we are also professional in our approach and treat all parties with respect. Our goal is to hold corporations accountable and to use the law to forge creative solutions to difficult problems for the benefit of our clients and society.

CASES AND RESULTS

The following is a representative list of some of our successes:

Out-of-Network UCR Rates Litigation: Named interim Class Counsel in antitrust case against WellPoint alleging conspiracy to artificially reduce reimbursements on "out of network" claims by policy holders through the use of the fraudulent Ingenix database. (*In Re WellPoint Out-of-Network UCR Rates Litigation, MDL 2074*).

- Fake Organic Cosmetic Products Litigation: Class counsel in cases involving misrepresentation of non-organic cosmetic products as organic. (*Brown, et al. v. Hain Celestial Group, CV-11-03082 LB (N.D. CA)*; *Golloher, et al. v. Todd Christopher International, RG 12 653621 (Alameda Sup. Ct.)*). Cases resulted in multi-million dollar class recoveries and agreements to stop violations of the California Organic Products Act.

- Fake "Naturals" Cosmetic Litigation: Class counsel in case involving false and misleading representations that certain Neutrogena cosmetic products are natural. (*Stephenson, et al. v. Neutrogena Corp., C 12-00426 JCS*).

- Lead in Jewelry: Environmental enforcement action co-litigated with the California Attorney General that has thus far resulted in commitments by hundreds of major retailers, importers and manufacturers of costume jewelry to significantly reduce the levels of lead in their jewelry. This case also led directly to California's landmark lead in jewelry statute, which was itself a precursor to passage of the federal Consumer Product Safety Improvement Act. (*State of California v. Burlington Coat Factory, et al.*).

- Peer-to-Peer (P2P) Interference: Named Class Counsel in class action against Comcast for alleged breach of contract and false advertising arising from interference with subscribers' use of peer-to-peer file sharing applications. Obtained \$16 million settlement for the class. (*In re: Comcast Peer-to-Peer (P2P) Transmission Contract Litigation*).
- Blue Shield Mid-Year Cost Increases: Named Class Counsel in class action alleging breach of contract and false advertising case challenging health insurer Blue Shield of California's mid-year unilateral increase to deductibles and other calendar year costs. Obtained \$2.7 million settlement for the class. (*Dervaes v. Blue Shield of California*).
- Chase Bank Debt Collection Practices: Named Class Counsel in class action against Chase Bank alleging violations of Federal Debt Collection Practices Act and California's Rosenthal Fair Debt Collection Practices Act in connection with Chase's credit card collection activities. (*Gardner v. Chase Bank USA, N.A.*).
- Greenwashing of Consumer Products: Counsel for non-profit group in private attorney general action resulting in Consent Judgments entered against more than 30 manufacturers and re-sellers requiring compliance with California's marketing and labeling requirements for cosmetic products. Examples of brands which have agreed to Court-ordered compliance with these requirements include Alterna, Aubrey, Beauty Without Cruelty, Blum Naturals, Boots, Curls, Derma E, Episencial, Kiss My Face, Morrocco Method, Nature's Baby, Organic Root Stimulator, Out of Africa, Pacifica, Palmer's, Parnevu, Peter Lamas, Pure & Basic, Shea Moisture, Simply Organic, Suki and Tints of Nature. (*Center for Environmental Health v. Advantage Research et al.*).
- False Advertising of Anti-Aging Products: Successfully prosecuted consumer protection action against maker of multi-million dollar "snake oil" product line falsely advertised as anti-aging cancer cure. (*Center for Environmental Health v. Almon Glenn Braswell*).
- Lead in Diaper Rash Ointment: Class action and private attorney general case that forced more than twenty-five major manufacturers and retailers of diaper rash ointment to reformulate their products to eliminate actionable levels of lead. Defendants included Bristol-Myers Squibb Co., Johnson & Johnson Consumer Companies, Inc., Pfizer, Inc., Schering-Plough HealthCare Products, Inc., and Warner-Lambert Company. (*Center for Environmental Health v. Bristol-Myers Squibb Co., et al., and Kenneth Johnson et al. v. Bristol-Myers Squibb Co., et al.*).
- US Airways Lap Child Litigation: Recovered refunds in a successful consumer class action case alleging that US Airways charged for "lap-children" in breach of its contract of carriage. (*Robins v. US Airways, Inc.*).
- Microsoft Technical Support Litigation: Class action consumer case against Microsoft forcing Microsoft to abandon its unilateral decision to discontinue free technical support for Office 2000 software products. (*Jones v. Microsoft Corporation*).

- Automobile Credit Truth-In-Lending Violations: Plaintiffs' Liaison Counsel in a large multi-party coordinated proceeding against hundreds of automobile dealerships alleging violations of the Truth in Lending Act that resulted in injunctions requiring disclosure of previously undisclosed lease and finance terms in automobile advertising. (*In Re Automobile Advertising Cases*).
- Nursing Home Staffing Litigation: Class action and private attorney general lawsuits against dozens of skilled nursing facilities that resulted in agreements to increase minimum staffing levels as required by California law. (*Foundation Aiding the Elderly v. Covenant Care, et al.*).
- Health Risks From Kava Kava: Represented class of consumers of Kava Kava dietary supplements against more than thirty-five defendants in case about failure to disclose the risk of liver disease from the products. (*In Re: Kava Kava Litigation*).
- Second Hand Smoke: Represented the City of San Jose and a private plaintiff in suit against major tobacco companies regarding failure to warn about second hand smoke in violation of California law. (*In Re Tobacco Cases II*).
- Tobacco Advertising: Represented non-profit group in case against outdoor advertising company defendants alleging violations of California's STAKE Act, which prohibits tobacco advertising within 1,000 feet of public schools, that resulted in the removal of hundreds of tobacco billboards located near schools in California. (*Center For Environmental Health v. Eller Media Corporation, et al.*).

ATTORNEY BACKGROUND AND EXPERIENCE

Eric S. Somers specializes in complex consumer, antitrust and environmental public interest litigation. Mr. Somers recently represented a class of consumers in a case against a major paint manufacturer alleging a manufacturing defect that resulted in nationwide relief for aggrieved consumers. He represented a group of plaintiffs in a case against major inkjet printer manufacturers regarding false and misleading print speed representations and he was plaintiff's counsel in a successful class action case alleging violations of the Fair Debt Collection Practices Act against Chase Bank. Mr. Somers was also Liaison Counsel in a complex coordinated proceeding alleging violations of the Truth In Lending Act by California automobile dealers that resulted in industry wide changes in advertising practices.

Mr. Somers also has significant experience enforcing California's landmark Right-to-Know law, Proposition 65, against Fortune 500 companies in the tobacco, pharmaceutical, chemical, cosmetics, water quality, costume jewelry and retail industries. These cases have led to reformulation of thousands of products designed for children to eliminate toxic chemicals such as lead, arsenic, toluene, di-n-butyl phthalate (DBP) and di-2-ethylhexyl phthalate (DEHP). Examples of consumer products that have been reformulated include children's playsets (arsenic treated wood), water filters (lead and arsenic) and children's jewelry (lead). Many of these private enforcement actions have been co-litigated with the California

Attorney General and other public enforcement agencies.

Mr. Somers founded the Lexington Law Group in 1996 and is a principal of the firm. Mr. Somers received his law degree from Hastings College of the Law and received a B.A. from Tulane University. While attending law school, Mr. Somers externed for the Honorable John P. Vukasin, Jr., United States District Court, Northern District of California.

Mark N. Todzo has devoted his practice of law to the representation of plaintiffs in antitrust, consumer and environmental protection litigation for over fifteen years. In that time, he has represented aggrieved individuals, nonprofit organizations and public entities in litigation that has curbed abusive and illegal corporate practices. Mr. Todzo's varied work has, among other things, helped to remove toxic chemicals from the environment, increased staffing in nursing homes, reformed deceptive advertising practices and recovered millions of dollars for the benefit of consumers. Mr. Todzo has argued cases in state and federal trial courts as well as courts of appeal and the California Supreme Court.

Mr. Todzo has served as class counsel in numerous class action lawsuits as well as liaison counsel in complex coordinated actions. He was recently lead counsel in a MDL case against Comcast on behalf of a class of subscribers who were blocked from using peer-to-peer file sharing programs. Mr. Todzo is currently representing classes of individuals in a variety of different cases, including an antitrust class action against Blue Shield seeking to recover increased health care payments for out of network charges.

Mr. Todzo joined the Lexington Law Group in 1998 and is a principal of the firm. Mr. Todzo received his law degree from Hastings College of the Law in 1993 and received a A.B. from Duke University in 1986.

Howard Hirsch has devoted his career to representing plaintiffs in public interest litigation to enforce consumer protections, conserve natural resources, and protect human health from toxic chemicals. After obtaining two years of training and experience at complex litigation with a large commercial law firm, Mr. Hirsch spent five years as a staff attorney at a national, non-profit environmental group representing individuals and other non-profits in citizen suits against polluters under the Clean Water Act, Clean Air Act, and other federal statutes. In that capacity, Mr. Hirsch helped secure the largest penalty ever assessed against a Pennsylvania polluter in a citizens' suit to date.

Mr. Hirsch joined the Lexington Law Group in 2003 and is a principal of the firm. Since joining LLG, Mr. Hirsch's practice has included significant experience litigating class actions against, among others, technology companies, airlines, and health care providers and insurers as well as enforcing California's Proposition 65. These cases have resulted in changes to deceptive business practices, substantial monetary recoveries for the benefit of consumers, and in significant reductions in human exposures to toxic chemicals,. Mr. Hirsch has also volunteered his legal services to the homeless community of San Francisco and currently serves as a volunteer arbiter for the San Francisco Department of Human Services resolving disputes between homeless shelters and their residents.

Mr. Hirsch graduated from the University of California Berkeley Boalt Hall School of Law in 1996 and from Boston College in 1993.

Joe Mann joined the Lexington Law Group as an associate in September 2012. His practice includes representing plaintiffs in public interest litigation involving consumer rights, corporate accountability, and removing toxic chemicals from consumer products. Prior to joining the Lexington Law Group, Mr. Mann worked as a litigation attorney for the National Environmental Law Center, a non-profit organization specializing in the enforcement of federal environmental laws against the nation's most egregious polluters. His practice focused on citizen enforcement suits under the Clean Water Act, the Clean Air Act, and the Endangered Species Act. He also brought several successful challenges against the federal government itself, striking down insufficiently protective rules promulgated by the U.S. Environmental Protection Agency.

Before joining NELC, Mr. Mann spent a year as the Law Clerk to U.S. District Court Judge Irma E. Gonzalez in the Southern District of California. Mr. Mann earned his J.D. degree from New York University School of Law in 1999, where he served as Editor-in-Chief of the NYU Environmental Law Journal. He received his undergraduate degree from Northwestern University in 1991.

Lisa Burger joined the Lexington Law Group as an associate in the Spring of 2008. Since earning her law degree from the University of Notre Dame Law in 2005, Ms. Burger has devoted her practice of law to exclusively representing plaintiffs in environmental, consumer protection, and civil rights litigation. Her current practice focuses on representing consumers in complex class action matters alleging antitrust and unfair and deceptive business practices.

Before joining Lexington Law Group, Ms. Burger was a litigation fellow with Disability Rights Advocates (DRA), a non-profit law center in Berkeley, California, that specializes in class action litigation on behalf of people with disabilities. As the David Boies / LD Access Fellow, Ms. Burger's practice focused on increasing access to standardized testing for people with learning disabilities and ADHD and involved nearly every aspect of civil litigation in both federal and state court.

EXHIBIT B

EXHIBIT B

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

Firm Name: Lexington Law Group

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	TOTAL LODESTAR
Eric Somers (P)	7.80		5.40		3.20				4.40		1.20	2.20			24.20	\$770.00	\$18,634.00
Howard Hirsh (P)															0.00	\$650.00	\$0.00
Mark Todzo (P)											0.30				0.30	\$750.00	\$225.00
Lisa Burger (A)											0.20				0.20	\$460.00	\$92.00
Victoria Hartanto (A)															0.00	\$430.00	\$0.00
Lucas Williams (A)															0.00	\$430.00	\$0.00
Joe Mann (A)	5.10		16.50		37.00	7.80		1.00	10.10	0.30	3.00	5.50			86.30	\$570.00	\$49,191.00
SUB-TOTAL	12.90	0.00	21.90	0.00	40.20	7.80	0.00	1.00	14.50	0.30	4.70	7.70	0.00	0.00	111.00	\$4,060.00	\$68,142.00
NON-ATTORNEYS																	
John Banister (PL)											1.00				1.00	\$235.00	\$235.00
Casey Kasher (PL)											0.60				0.60	\$225.00	\$135.00
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.60	0.00	0.00	0.00	1.60	\$460.00	\$370.00
GRAND TOTAL:	12.90	0.00	21.90	0.00	40.20	7.80	0.00	1.00	14.50	0.30	6.30	7.70	0.00	0.00	112.60	\$4,520.00	\$68,512.00

EXHIBIT C

EXHIBIT D

(REDACTED)

Batteries Time Detailed

Date	Staff	Category	Description	Time	Slip Value
6/3/2013	JMann	11	Confer w/ LMB re pending tasks; update case task list re same.	0.20	\$114.00
6/17/2013	ESomers	11	Review request re reports from Liaison Counsel and meet with LGV re revisions.	0.30	\$231.00
6/24/2013	ESomers	1	TC R. [REDACTED] re documentation for purchases.	0.60	\$462.00
6/25/2013	ESomers	1	Exchange e-mails with [REDACTED] documentation (0.2). Review and forward to steering committee counsel (0.5).	0.70	\$539.00
6/26/2013	LBurger	1	Review and save new receipts from [REDACTED]	0.20	\$92.00
6/26/2013	JMann	9	Email from JRB re pleading deadlines.	0.10	\$57.00
6/27/2013	JMann	1	Email w/ [REDACTED] re product photos & purchase info.	0.40	\$228.00
6/27/2013	JMann	1	Email, confer w/ ESS re sending [REDACTED] info to Scott+Scott (0.2); email w/ J. Jasnoch re same (0.1).	0.30	\$171.00
6/27/2013	ESomers	1	Review new information and documentation re class reps requested by lead counsel (0.7). Meet with JJM re class rep issues (0.2).	0.90	\$513.00
6/27/2013	JMann	1	TC B. [REDACTED] re iPad product info (0.2); [REDACTED] (0.4); email [REDACTED] re same (0.2); email J. Jasnoch re same (0.1).	0.90	\$693.00
6/28/2013	ESomers	1	Review and send Protective Order exhibit to clients (0.4). Exchange e-mails re amended complaint filing with class counsel (0.3).	0.70	\$539.00
6/28/2013	JMann	1	Update case notes re [REDACTED] product info (0.1); email w/ [REDACTED] re new photos (0.1); email J. Jasnoch re same (0.1).	0.30	\$171.00
6/28/2013	JMann	11	Email w/ J. Jasnoch re having class reps sign Confid Agmt re Stip P.O. (0.2); email [REDACTED] re filling out same (0.5).	0.70	\$399.00
7/1/2013	ESomers	1	Exchange e-mails with class reps re: Exhibit A to Protective Order (0.4). Forward Ex. A to class counsel (0.1). Send 1st Amended Complaint to [REDACTED] and [REDACTED] for review with explanatory e-mail (0.7).	1.20	\$924.00
7/1/2013	ESomers	9	Review 1st Amended Consolidated Indirect Complaint in preparation to discuss with clients.	0.50	\$385.00
7/1/2013	JMann	8	Email from J. Jasnoch re: revised complaint (0.1); email w/ J. Jasnoch re: missing allegations re: [REDACTED] (0.2); review justifications for class period (0.1); email [REDACTED] re: exclusion as rep in case (0.3).	0.70	\$399.00
7/1/2013	JMann	8	Email w/ [REDACTED] re: reviewing allegations in revised complaint (0.1); email w/ J. Jasnoch re: same (0.1).	0.20	\$114.00
7/1/2013	JMann	11	Email w/ [REDACTED] re: signed Confid Agmt re: Stip P.O. (0.3); email J. Jasnoch re: same (0.1).	0.40	\$228.00
7/2/2013	JMann	11	Email w/ [REDACTED] re: case resolved as to him.	0.10	\$57.00
7/3/2013	JMann	8	Email [REDACTED] re: finalized amend complaint.	0.10	\$57.00
7/8/2013	ESomers	1	TC R. Hyams re: Ex. A to Protective Order (0.6). Email lead counsel re: mistaken product in complaint (0.2).	0.80	\$616.00
7/22/2013	JMann	11	Email from JRB re: status conf.	0.10	\$57.00
9/25/2014	JMann	1	Email from J. Jasnoch re obtaining product docs & preservation declarations from clients (0.1); review earlier product questionnaires for [REDACTED] & [REDACTED] (0.3); email w/ Jasnoch re [REDACTED] not still in suit (0.1).	0.50	\$285.00

Batteries Time Detailed

9/25/2014	JMann	1	Confer w/ ESS re contacting clients re obtaining additional product docs & preservation declarations (0.1); email w/ J. Ames re same (0.2); prepare preservation letters for ██████████ (0.4).	0.70	\$399.00
9/26/2014	JMann	1	Review info sent earlier to ██████████ (0.1); TC w/ ██████████ re obtaining additional product docs & preservation declaration (0.3); email ██████████ re clarification on same (0.1).	0.50	\$285.00
9/30/2014	ESomers	1	TC ██████████ re Preservation Declaration, letter to ██████████ and additional purchase documents (0.3). Draft explanatory e-mail and send documents and declaration to client for review (0.2).	0.50	\$385.00
9/30/2014	ESomers	1	TC ██████████ re Preservation Declaration, letter to ██████████ and additional purchase documents (0.3). Draft explanatory e-mail and send documents and declaration to client for review (0.2).	0.50	\$385.00
9/30/2014	ESomers	1	TC ██████████ re Preservation Declaration, letter to ██████████ and additional purchase documents (0.3). Draft explanatory e-mail and send documents and declaration to ██████████ for review (0.2).	0.50	\$385.00
9/30/2014	JMann	1	Email w/ J. Jasnoch re status of product docs & preservation declarations from ██████████ (0.1); email ██████████ re same (0.2).	0.30	\$171.00
9/30/2014	JMann	1	Email from ESS to S. Hiller, R. Hyams, M. Weiner re additional product docs needed (0.2); email w/ J. Jasnoch re Ames signed preservation declaration (0.2).	0.40	\$228.00
10/1/2014	JMann	1	Email w/ J. Jasnoch, ██████████ re ██████████ docs still needed.	0.10	\$57.00
10/2/2014	JMann	1	Email from ESS re ██████████ signed preservation declaration.	0.10	\$57.00
10/2/2014	ESomers	9	Review Order re Motions to Dismiss in order to explain to plaintiffs ██████████	0.80	\$616.00
10/3/2014	ESomers	1	Exchange e-mails with ██████████ re Preservation Declaration.	0.40	\$308.00
10/4/2014	JMann	1	Email from ESS re ██████████ signed preservation declaration.	0.10	\$57.00
10/6/2014	ESomers	1	Review e-mails from lead counsel and reach out to ██████████ re Preservation Declaration.	0.50	\$385.00
10/6/2014	JMann	1	Email J. Jasnoch re ██████████ preservation declarations (0.2); email w/ ██████████ re status of additional doc production (0.3).	0.50	\$285.00
10/6/2014	JBanister	11	Review executed ██████████ preservation declaration.	0.10	\$23.50
10/6/2014	JBanister	11	Review executed ██████████ preservation declaration.	0.10	\$23.50
10/7/2014	ESomers	1	Call R. Hyams re preservation declaration and evidence update (0.3). Exchange e-mails with ██████████ re questions from ██████████ (0.2).	0.50	\$385.00
10/7/2014	JMann	3	Email w/ ESS re additional doc production from ██████████ re product purchases.	0.10	\$57.00
10/8/2014	JMann	3	Email J. Jasnoch re ██████████ purchase docs (0.1); email ██████████ re docs (0.1); email J. Verducci, L. Garcia re client preservation decls, additional purchase docs (0.2).	0.40	\$228.00
10/8/2014	JBanister	11	Review executed ██████████ preservation dec.	0.10	\$23.50
4/24/2015	JMann	3	Email from J. Jasnoch re RFP/Rog responses needed from class reps.	0.10	\$57.00
4/27/2015	JMann	3	Review RFP/Rogs propounded on class reps.	0.30	\$171.00
4/28/2015	JMann	3	Confer w/ ESS re RFP/Rog responses needed from class reps.	0.10	\$57.00
4/28/2015	ESomers	3	TC C. Burke re discovery requests.	0.70	\$539.00
4/29/2015	JMann	3	Confer w/ ESS re RFP/Rog responses needed from class reps.	0.10	\$57.00
4/30/2015	ESomers	3	TC E. Fastiff re discovery matters.	0.30	\$231.00

Batteries Time Detailed

5/1/2015	JMann	3	Confer w/ ESS re status of response to RFP/Rogs propounded on class reps.	0.10	\$57.00
5/7/2015	JMann	3	Email w/ J. Jasnoch, confer w/ ESS re status of response to RFP/Rogs propounded on class reps (0.2); email J. Ames re responding to same (0.2); email from ESS to other class reps re same (0.1).	0.50	\$285.00
5/7/2015	JMann	3	Email from J. Jasnoch re draft responses to RFP/Rogs propounded on class reps (0.1); email class reps re reviewing same (0.2); email w/ Jasnoch re verification pages (0.2).	0.50	\$285.00
5/7/2015	ESomers	3	TC J. Jasnoch at Scott & Scott re client discovery responses (0.4). Review requests and draft e-mail to each client re responses and verifications (0.8).	1.20	\$924.00
5/11/2015	JMann	3	Email w/ J. Jasnoch re status of draft Rog responses (0.2); TC, email ██████████ re same (0.6); email w/ Jasnoch re content confirmed (0.1).	0.90	\$513.00
5/12/2015	JMann	3	Email w/ J. Jasnoch re finalized Rog responses for class reps.	0.40	\$228.00
5/13/2015	JMann	3	Email w/ J. Jasnoch re verification pages on Rog responses (0.1); email class reps re same (0.2); email w/ J. Ames re signed verification (0.1).	0.40	\$228.00
5/13/2015	JMann	3	Edit draft Rog responses for ██████████ (0.4); email J. Jasnoch, JRB re same (0.1).	0.50	\$285.00
5/18/2015	JMann	3	Confer w/ ESS re ██████████ verification on Rog responses.	0.10	\$57.00
5/18/2015	ESomers	3	TC ██████████ re discovery responses and verifications.	0.50	\$385.00
5/19/2015	JMann	3	Confer w/ JRB re ██████████ verification on Rog responses.	0.10	\$57.00
5/20/2015	JMann	3	Email ██████████ re status of verifications on Rog responses (0.1); email J. Jasnoch re ██████████ verifications (0.1).	0.20	\$114.00
5/21/2015	JMann	11	Email from J. Scott re ██████████ may not qualify as class rep.	0.10	\$57.00
5/21/2015	JMann	3	Email w/ ██████████ re verifications on Rog responses.	0.10	\$57.00
5/22/2015	JMann	3	Email w/ ██████████ re verifications on Rog responses.	0.10	\$57.00
5/27/2015	JMann	11	Email J. Jasnoch, J. Scott re ██████████ qualify as class rep.	0.10	\$57.00
5/27/2015	JMann	3	TC w/ ██████████ re status of verifications on Rog responses (0.1); confer w/ ESS re same (0.1).	0.20	\$114.00
5/27/2015	ESomers	3	TC R. ██████████ to review discovery responses.	0.50	\$385.00
5/28/2015	JMann	3	Email w/ ██████████, J. Jasnoch re signed verifications on Rog responses.	0.10	\$57.00
9/15/2015	JMann	9	Email from J. Jasnoch re RFP needs from class reps (0.1); email from ESS to ██████████ re same (0.1); email from ESS to Jasnoch re same (0.1).	0.30	\$171.00
9/16/2015	JMann	9	TC w/ ESS re discovery needs from class reps (0.1); ██████████ (0.4); email J. Jasnoch re same (0.1).	0.60	\$342.00
9/17/2015	JMann	9	Email, TC w/ ██████████ re Toshiba docs (0.2); email w/ ██████████ re same (0.1); review email search capabilities (0.1).	0.40	\$228.00
9/18/2015	JMann	9	Email, TC w/ ██████████ re Toshiba docs (0.2); email, TC w/ ██████████ re same (0.2); TC w/ ██████████ re same (0.2); email J. Jasnoch re class rep responses on same (0.1).	0.70	\$399.00
9/24/2015	ESomers	9	TC J. Jasnoch at Scott & Scott re request from lead for verifications from class rep.	0.40	\$308.00
9/30/2015	JMann	9	TC w/ J. Jasnoch re ██████████ disco needs, possible ██████████ depo (0.2); review operative Complaint re ██████████ allegations (0.1); email Jasnoch re discussing same w/ ESS (0.1).	0.40	\$228.00
10/5/2015	ESomers	9	TC C. Burke re client document preservation requests and discovery responses.	0.50	\$385.00
10/6/2015	ESomers	9	Review letter from Toshiba re ██████████ preservation order.	0.40	\$308.00

Batteries Time Detailed

10/7/2015	JMann	9	Email w/ ESS re doc preservation instructions sent earlier to [REDACTED]	0.10	\$57.00
10/7/2015	JMann	9	Confer w/ ESS re Motion to Remove claims as to [REDACTED] filed (0.2); review briefing on same (0.2); review class rep purchase info (0.2); email from ESS, J. Jasnoch re Motion (0.1).	0.70	\$399.00
10/7/2015	JMann	9	Confer w/ ESS re contacting [REDACTED] re evidence preservation (0.1); email Franklin re same (0.1); email D. Lambrinus re same (0.1).	0.30	\$171.00
10/8/2015	JMann	9	Email from D. Lambrinus, M. Caylao re [REDACTED] draft interrogatory responses, verification form (0.1); review same (0.1); email, TC [REDACTED] re same (0.6); confer w/ ESS re discovery issues (0.1).	0.90	\$513.00
10/13/2015	JMann	9	Email w/ [REDACTED] signed verification form on interrogatory responses (0.1); email D. Lambrinus re same (0.1).	0.20	\$114.00
10/14/2015	JMann	9	Email from ESS re Reply on Motion to Remove claims as to [REDACTED] (0.1); review same (0.1).	0.20	\$114.00
11/11/2015	JMann	9	Email from J. Jasnoch re verifications required for supplemental interrogatory responses (0.1); review responses & email w/ ESS re same (0.1).	0.20	\$114.00
11/13/2015	JMann	9	Email class reps re supplemental disco responses & verification forms.	0.50	\$285.00
11/16/2015	JBanister	11	Resolve PDF issue with [REDACTED] verification page (0.1); email JJM re same (0.1).	0.20	\$47.00
11/16/2015	JMann	9	Email w/ [REDACTED] re signed verification form on supplemental disco responses.	0.20	\$114.00
11/17/2015	JMann	9	Email w/ [REDACTED] re signed verification form on supplemental disco responses.	0.10	\$57.00
11/19/2015	JMann	9	Email class reps re supplemental disco responses & verification forms (0.2); email w/ [REDACTED] re same (0.1).	0.30	\$171.00
11/20/2015	JMann	9	Email w/ [REDACTED] re supplemental disco responses & verification form.	0.10	\$57.00
11/24/2015	JMann	9	Email w/ [REDACTED] re supplemental disco responses & verification form.	0.10	\$57.00
11/30/2015	MTodzo	11	Confer with ESS and HJH re status and strategy for class rep. depositions.	0.30	\$225.00
11/30/2015	JMann	9	Email from J. Jasnoch re [REDACTED] depo scheduling (0.1); confer w/ ESS, HJH re same (0.1); email w/ [REDACTED] re same (0.5).	0.70	\$399.00
12/1/2015	JMann	9	Email w/ [REDACTED] re supplemental disco responses & verification form (0.1); email w/ J. Jasnoch re same (0.1).	0.20	\$114.00
12/1/2015	JMann	9	Email w/ S. Sklaver re deposition planning for [REDACTED]	0.20	\$114.00
12/2/2015	ESomers	9	Review e-mails re [REDACTED] deposition (0.2). TC S. Sklaver re available dates (0.2). Meet with HJH re defending deposition (0.3). Send e-mail confirming possible dates to S. Sklaver (0.1).	0.80	\$616.00
12/2/2015	JMann	9	Email [REDACTED] re deposition planning (0.1); email from J. Jasnoch re depo preparation (0.1); review outline, L. Lincoln transcript (0.1); email from ESS to S. Sklaver re depo prep (0.1).	0.40	\$228.00
12/4/2015	JMann	9	Email w/ J. Ames re deposition planning (0.1); review depo outline, [REDACTED] transcript (0.7); confer w/ ESS re depo prep issues (0.1).	0.90	\$513.00
12/11/2015	ESomers	9	Send inquiry to class counsel re [REDACTED] depo.	0.20	\$154.00
12/14/2015	JMann	9	Email from ESS, S. Sklaver re [REDACTED] re depo prep.	0.10	\$57.00
12/15/2015	JMann	9	Email w/ S. Sklaver re [REDACTED] depo scheduling.	0.10	\$57.00
12/16/2015	JMann	9	Confer w/ ESS re defending [REDACTED] depo (0.1); email [REDACTED] re revised depo dates, preparatory tasks (0.1).	0.20	\$114.00

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12/18/2015	JMann	9	Email w/ [REDACTED] re depo issues.	0.10	\$57.00
12/22/2015	JMann	9	Email, TC w/ [REDACTED] re deposition planning (0.4); email S. Sklaver re same (0.1).	0.50	\$285.00
12/24/2015	JMann	9	Email from S. Sklaver re deposition planning for J. Ames.	0.10	\$57.00
12/28/2015	JMann	9	Email [REDACTED] re deposition prep issues.	0.20	\$114.00
1/7/2016	JMann	6	Email from K. Hoek re [REDACTED] additional product purchases.	0.10	\$57.00
1/7/2016	ESomers	11	Exchange e-mails with lead counsel re [REDACTED] purchases (0.2). Reach out to [REDACTED] re information and send back to class counsel (0.3).	0.50	\$385.00
1/8/2016	JMann	6	Email from [REDACTED] ESS re no additional product purchases.	0.20	\$114.00
1/8/2016	JMann	5	[REDACTED]	0.20	\$114.00
1/11/2016	JMann	5	[REDACTED]	0.20	\$114.00
1/11/2016	JMann	6	Email ESS, JKK re discovery issues.	0.10	\$57.00
1/19/2016	JMann	5	Email from S. Sklaver re [REDACTED] deposition in S.F. (0.1); email from JRB re class cert filings (0.1).	0.20	\$114.00
1/20/2016	JMann	5	Email [REDACTED] re deposition in S.F., good dates for depo prep (0.1); email ESS re same (0.1).	0.20	\$114.00
1/21/2016	JMann	5	Email, TC w/ K. Pachman re [REDACTED] depo prep (0.4) email [REDACTED] re same (0.1); confer w/ ESS re same (0.1).	0.60	\$342.00
1/22/2016	JMann	5	Email from ESS to C. Burke, J. Jasnoch re depo defense for [REDACTED] (0.1); email K. Pachman re taking lead on same (0.1).	0.20	\$114.00
1/22/2016	ESomers	5	Draft e-mail to class counsel re class rep depo.	0.30	\$231.00
1/25/2016	JMann	5	Email w/ K. Pachman re [REDACTED] depo prep (0.1); review related materials (0.1).	0.20	\$114.00
1/26/2016	JMann	5	Review J. Ames Deposition Notice.	0.10	\$57.00
2/2/2016	JMann	5	Review materials for [REDACTED] depo prep (0.1); email K. Pachman re receiving unredacted copy of IPP class cert motion (0.1).	0.20	\$114.00
2/3/2016	JMann	5	TC w/ [REDACTED] re depo logistics.	0.10	\$57.00
2/4/2016	JMann	5	Email from K. Pachman re unredacted copy of IPP class cert motion (0.1); TC, email w/ [REDACTED] re depo prep (0.3).	0.40	\$228.00
2/6/2016	JMann	5	Review class cert papers in prep for [REDACTED] depo (0.3); develop outline of depo issues (1.0).	1.30	\$741.00
2/6/2016	JMann	5	Review [REDACTED] purchase info in prep for [REDACTED] depo; review R. Johns depo transcript; identify issues to discuss w/ [REDACTED].	1.80	\$1,026.00
2/8/2016	JMann	5	Email w/ K. Pachman re docs needed for [REDACTED] depo (0.2); review Protective Order, disco orders (0.2); look for docs requested by Pachman (0.2); identify follow-up issues (0.3).	0.90	\$513.00
2/9/2016	ESomers	11	Review e-mail from client [REDACTED] and send e-mail re status as class rep (0.2). TC Class Counsel re [REDACTED] (0.2).	0.40	\$308.00
2/9/2016	JMann	11	Email from [REDACTED] ESS re phone batteries no longer in action as class rep (0.1); email ESS re [REDACTED] status (0.1).	0.20	\$114.00
2/9/2016	JMann	5	Review materials in prep for [REDACTED] depo.	0.80	\$456.00
2/10/2016	ESomers	5	Meet with JJM re request for [REDACTED] depo (0.2). Review Order allowing departing class rep depositions (0.1). TC R. [REDACTED] re request for deposition (0.6). TC K. Kauble re depo request (0.3).	1.20	\$924.00

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2/10/2016	JMann	5	Prepare for TC w/ K. Pachman re agenda for [REDACTED] depo prep session (0.3); TC w/ Pachman re same (0.2); email w/ Pachman re [REDACTED] earlier interrogatory responses, docs produced (0.1); prepare outline for depo prep session (1.4).	2.00	\$1,140.00
2/10/2016	JMann	5	Confer w/ ESS re potential [REDACTED] depo.	0.10	\$57.00
2/10/2016	JMann	5	Email [REDACTED] re materials for depo prep session (0.2); TC w/ [REDACTED], K. Pachman re depo prep (1.0); TC w/ Pachman re follow-up issues (0.1); confer w/ LGV re depo logistics (0.1); email [REDACTED] re additional relevant docs (0.1).	1.50	\$855.00
2/10/2016	JMann	5	Email w/ K. Pachman re additional materials for [REDACTED] depo prep (0.1); review same (0.1).	0.20	\$114.00
2/12/2016	ESomers	5	TC L. Chan at Lief re [REDACTED] deposition (0.2). Exchange e-mails with K. Kauble at Susmann re same (0.2).	0.40	\$308.00
2/12/2016	JMann	5	Email w/ K. Pachman re Defendant attorneys attending [REDACTED] depo.	0.10	\$57.00
2/15/2016	JMann	5	Prepare for [REDACTED] depo (2.1); identify docs to review with deponent (0.6); email [REDACTED] re docs to review (0.2).	2.90	\$1,653.00
2/15/2016	JMann	5	Draft outline for [REDACTED] depo (0.7); review earlier depo transcripts of other class reps (1.1).	1.80	\$1,026.00
2/16/2016	JMann	5	[REDACTED] (0.1); email w/ K. Pachman re same (0.1); confer w/ ESS re depo issues (0.1).	0.30	\$171.00
2/16/2016	JMann	5	[REDACTED] (0.7); [REDACTED] (0.2); [REDACTED] (0.5).	1.40	\$798.00
2/16/2016	JMann	5	Depo prep session w/ [REDACTED] & K. Pachman.	4.30	\$2,451.00
2/17/2016	JBanister	11	Prepare docs for [REDACTED] depo prep.	0.30	\$70.50
2/17/2016	JMann	5	Prepare for [REDACTED] depo.	0.50	\$285.00
2/17/2016	JMann	5	Defend [REDACTED] depo (1st chair) (6.3); confer [REDACTED] & K. Pachman re issues arising at depo (0.3); identify follow-up issues (0.2).	6.80	\$3,876.00
2/18/2016	JMann	5	Email w/ ESS re summary of [REDACTED] depo.	0.10	\$57.00
2/25/2016	ESomers	5	Exchange e-mails with L. Chan at Lief and D. Lambrinos at CPM re [REDACTED] depo (0.2). Conference call with L. Chan at Lief and D. Lambrinos at CPM and K. Pachman at Susman re [REDACTED] depo (0.6).	0.80	\$616.00
2/25/2016	JMann	5	Confer w/ ESS re [REDACTED] depo follow-up issues, possible [REDACTED] depo (0.2); check [REDACTED] status under 3AC (0.1).	0.30	\$171.00
2/25/2016	JMann	6	Email w/ K. Pachman re Defendant request for additional info from [REDACTED] (0.2); review M. Rizik letter re same (0.1); email [REDACTED] re finding additional info (0.5).	0.80	\$456.00
2/26/2016	JMann	6	Email w/ K. Pachman re additional doc search for [REDACTED] (0.1); email [REDACTED] re same (0.2).	0.30	\$171.00
2/29/2016	ESomers	5	TC [REDACTED] re departing class rep deposition.	0.50	\$385.00
2/29/2016	JMann	6	Email from K. Pachman, ESS re [REDACTED] depo costs (0.1); [REDACTED] (0.3); review same (0.1); [REDACTED] (0.1).	0.60	\$342.00
3/1/2016	JMann	5	Email from K. Pachman re [REDACTED] depo transcript (0.1); review transcript (0.1).	0.20	\$114.00
3/1/2016	JMann	6	Email w/ J. Ames re search for additional responsive docs requested by Defendants.	0.10	\$57.00
3/2/2016	JMann	6	Email w/ K. Pachman re [REDACTED] info needs.	0.40	\$228.00

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3/3/2016	JMann	5	Email from K. Pachman to ESS re potential [REDACTED] depo.	0.10	\$57.00
3/3/2016	JMann	5	Confer w/ JRB re [REDACTED] depo transcript.	0.10	\$57.00
3/4/2016	JMann	5	Email w/ [REDACTED] additional product photos, depo transcript review.	0.20	\$114.00
3/6/2016	JMann	5	Review [REDACTED] depo transcript (0.9); identify issues to follow up with Ames (0.3).	1.20	\$684.00
3/7/2016	JMann	5	Email from K. Pachman re follow-up on [REDACTED] depo transcript.	0.10	\$57.00
3/7/2016	JMann	3	Email from K. Pachman re [REDACTED] supplemental special interrogatory responses (0.1); review responses (0.5); compare rog responses to answers given at [REDACTED] depo (0.3).	0.90	\$513.00
3/8/2016	JMann	3	TC, email w/ K. Pachman [REDACTED] supplemental interrogatory responses, potential conflicts w/ depo testimony (0.3); revise rog responses (0.6).	0.90	\$513.00
3/9/2016	JMann	3	Email w/ Ames re [REDACTED] updating contact info.	0.10	\$57.00
3/11/2016	ESomers	3	Review e-mail re request for additional verifications from clients (0.1). Send e-mails to [REDACTED] and [REDACTED] (0.3). Send additional e-mail re request [REDACTED] deposition dates (0.1). Respond to calls from clients re request for additional information from 2015 discovery responses (0.4). Send e-mail to lead counsel re status (0.3).	1.20	\$924.00
3/13/2016	ESomers	3	Exchange e-mails with [REDACTED] re revised discovery responses and verifications.	0.30	\$231.00
3/14/2016	JBanister	11	Edit [REDACTED] verification pages and draft email to JJM re same.	0.20	\$47.00
3/14/2016	JMann	3	Email w/ [REDACTED] re lead counsel request for new verifications (0.6); email [REDACTED] re lead counsel now say verification not needed (0.1).	0.70	\$399.00
3/14/2016	JMann	3	Email from [REDACTED] (CO class rep) re new disco verifications requested by lead counsel.	0.10	\$57.00
3/14/2016	JMann	3	Edit [REDACTED] re supplemental special interrogatory responses (0.3); email [REDACTED] re signing new verification on same (0.1).	0.40	\$228.00
3/14/2016	JMann	5	Email from ESS, [REDACTED] re depo scheduling (0.1); TC, w/ [REDACTED] re depo preparation, RFP responses (0.9); determine next steps re [REDACTED] depo prep (0.3).	1.30	\$741.00
3/14/2016	JMann	3	Email from K. Pachman, D. Lambrinus revised verification on [REDACTED] supplemental RFP responses (0.2); email [REDACTED] re verifications, supplemental special interrogatory responses (0.4).	0.60	\$342.00
3/14/2016	JMann	3	Email [REDACTED] (VT class rep) re lead counsel request for new disco verifications.	0.20	\$114.00
3/14/2016	JMann	3	TC w/ [REDACTED] re supplemental RFP/special interrogatory responses (1.1); email, TC w/ D. Lambrinus, K. Pachman re RFP verifications, [REDACTED] supplemental RFP/special interrogatory responses, depo transcript review issues (0.4).	1.50	\$855.00
3/14/2016	JMann	3	Email [REDACTED] (MA class rep) re no new disco verifications needed, per lead counsel instructions.	0.10	\$57.00
3/15/2016	JMann	3	Email [REDACTED] re verifications on supplemental RFP/special interrogatory responses (0.3); email, TC w/ D. Lambrinus re same (0.2).	0.50	\$285.00
3/15/2016	JMann	5	Email w/ [REDACTED] re potential depo dates, verifications on supplemental RFP/special interrogatory responses (0.4); email w/ K. Pachman re depo dates, potential issues (0.1); email from ESS re [REDACTED] depo prep (0.1).	0.60	\$342.00
3/16/2016	JMann	11	Email w/ HJH re C. Conover (VA class rep) status as operative plaintiff (0.1); determine same (0.1).	0.20	\$114.00
3/17/2016	JMann	5	Email w/ K. Pachman re [REDACTED] depo issues.	0.30	\$171.00
3/18/2016	JMann	12	Email from D. Lambrinus re Sony proposed settlement (0.1); review settlement (0.2).	0.30	\$171.00

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4/20/2016	JMann	6	Email w/ K. Pachman re estimating dates for missing metadata on [REDACTED] docs (0.1); email w/ [REDACTED] re same (0.2).	0.30	\$171.00
4/21/2016	JMann	6	Email w/ K. Pachman re metadata on [REDACTED] doc production (0.1); determine estimates, draft chart for same (1.4); email w/ [REDACTED] re checking data on chart (0.3); email w/ Pachman re add'l [REDACTED] docs produced recently (0.1).	1.90	\$1,083.00
4/22/2016	JMann	6	Email w/ [REDACTED] re metadata estimates on doc production (0.2); email K. Pachman re same (0.2); email w/ D. Lamrbinus re metadata on [REDACTED] photos (0.1).	0.50	\$285.00
4/25/2016	JMann	6	Email w/ [REDACTED] re metadata estimates on Makita drill photos (0.2); email w/ D. Lamrbinus re same (0.1).	0.30	\$171.00
4/26/2016	JMann	3	Email w/ K. Pachman re edits to [REDACTED] supp interrogatory responses.	0.10	\$57.00
5/4/2016	JMann	5	Email from J. Lipson (TSG) re [REDACTED] depo transcript (0.1); TC w/ K. Pachman re same (0.1).	0.20	\$114.00
5/5/2016	JMann	5	TC w/ K. Pachman re [REDACTED] depo transcript (0.1); TC w/ J. Lipton (TSG) re same (0.1).	0.20	\$114.00
5/10/2016	JMann	5	TC w/ J. Lipson (TSG) re [REDACTED] depo transcript.	0.10	\$57.00
5/16/2016	JMann	3	Email w/ [REDACTED] re missing camcorder found (0.2); review photos produced earlier in discovery, interrogatory responses on same (0.1); email [REDACTED] re photos of same (0.2); email D. Lamrbinus, K. Pachman re same (0.2).	0.70	\$399.00
5/17/2016	JMann	3	Email from K. Pachman re amending interrogatory responses on [REDACTED] camcorder.	0.10	\$57.00
5/18/2016	JMann	3	Email w/ K. Pachman re amended interrogatory responses for [REDACTED] metadata on photos of missing camcorder (0.1); review responses (0.1); email [REDACTED] re reviewing same, signing verification (0.1); email Pachman re same (0.1).	0.40	\$228.00
6/16/2016	JMann	10	Check on status of Defendants' Opp to IPP's Motion for Class Cert (0.1); email w/ [REDACTED] re status of same (0.1).	0.20	\$114.00
7/25/2016	JMann	11	Email w/ ESS, MNT, JKK re case status.	0.10	\$57.00
9/12/2016	JMann	11	Email w/ [REDACTED] re case status.	0.10	\$57.00
10/14/2016	JMann	11	Email w/ ESS, JKK re case status.	0.10	\$57.00
11/20/2016	JMann	10	Confer w/ [REDACTED] re class cert hearing.	0.10	\$57.00
11/21/2016	ESomers	12	[REDACTED]	0.50	\$385.00
11/21/2016	JMann	12	[REDACTED]	0.30	\$171.00
11/23/2016	ESomers	12	[REDACTED]	0.20	\$154.00
11/23/2016	JMann	12	[REDACTED] class cert hearing (0.1); [REDACTED]	0.60	\$342.00
11/26/2016	JMann	12	[REDACTED]	0.10	\$57.00
12/9/2016	JMann	11	[REDACTED]	0.10	\$57.00
12/16/2016	ESomers	12	Review e-mail from D. Lamrbinus [REDACTED] (0.1). [REDACTED] and TC JJM re summary for client (0.5).	0.60	\$462.00
12/16/2016	JMann	12	Email from D. Lamrbinus re [REDACTED] contacting class reps (0.1); [REDACTED] (0.8); [REDACTED] (0.2).	1.10	\$627.00

Batteries Time Detailed

12/19/2016	JMann	12	Email from D. Lambrinus re issues on [REDACTED] (0.1); email w/ [REDACTED] re reviewing/approving same (0.5); email Lambrinus re [REDACTED] approval (0.1).	0.70	\$399.00
12/19/2016	CKasher	11	Submit ESS application to 9th circuit court of appeals.	0.30	\$67.50
12/21/2016	CKasher	11	File ESS Notice of Appearance in appellate case.	0.30	\$67.50
12/21/2016	JMann	11	Email w/ ESS re 9th Circuit appearance.	0.10	\$57.00
1/4/2017	JMann	12	[REDACTED]	1.00	\$570.00
1/5/2017	JMann	12	[REDACTED]	0.30	\$171.00
1/6/2017	JMann	12	[REDACTED] (0.1); TC, email w/ B. Siegel re same (0.1).	0.20	\$114.00
1/10/2017	JMann	11	Review recent filings (0.2); email ESS re case status (0.1).	0.30	\$171.00
1/17/2017	JMann	11	Email from J. Peterson, ESS re case management issues.	0.10	\$57.00
2/8/2017	JMann	12	[REDACTED]	0.10	\$57.00
Grand Total				112.60	\$68,512.00

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation

LEXINGTON LAW GROUP

Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	\$230
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at \$0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	\$402.20
Miscellaneous	
TOTAL:	\$632.20