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Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

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

MDL No. 2420

This Documents Relates to:
ALL ACTIONS

COMPENDIUM OF CLASS
REPRESENTATIVE DECLARATIONS
IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS' MOTION
FOR ATTORNEYS FEES, EXPENSES,
AND SERVICE AWARDS

Date: July 16, 2019

Time: 2:00pm

Judge: Hon. Yvonne Gonzalez Rogers

Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

Ex.	Description
1	Declaration of Plaintiff Jason Ames in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 16, 2019
2	Declaration of Plaintiff Caleb Batey in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, April 17, 2019
3	Declaration of Plaintiff Christopher Bessette in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, April 18, 2019
4	Declaration of Plaintiff Cindy Booze in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 10, 2019
5	Declaration of Plaintiff Matt Bryant in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 15, 2019
6	Declaration of Plaintiff Steven Bugge in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 13, 2019
7	Declaration of Plaintiff William Cabral in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 10, 2019
8	Declaration of Terrence Howzell (On Behalf of Plaintiff City of Palo Alto) in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 17, 2019
9	Declaration of Shannon Moore (On Behalf of Plaintiff City of Richmond) in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 16, 2019
10	Declaration of Plaintiff Matthew Ence in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 10, 2019
11	Declaration of Plaintiff Drew Fennelly in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 10, 2019
12	Declaration of Plaintiff Sheri Harmon in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 13, 2019
13	Declaration of Plaintiff Christopher Hunt in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 11, 2019
14	Declaration of Plaintiff John Kopp in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 11, 2019
15	Declaration of Plaintiff Linda Lincoln in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 13, 2019
16	Declaration of Plaintiff Patrick McGuinness in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 13, 2019

Ex.	Description
17	Declaration of Plaintiff Joseph O'Daniel in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 12, 2019
18	Declaration of Plaintiff Tom Pham in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 10, 2019
19	Declaration of Plaintiff Piya Robert Rojanasathit in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 16, 2019
20	Declaration of Plaintiff Bradley Seldin in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 10, 2019
21	Declaration of Plaintiff Donna Shawn in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 15, 2019
22	Declaration of Plaintiff David Tolchin in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 10, 2019
23	Declaration of Plaintiff Bradley Van Patten in Support of Indirect Purchaser Plaintiffs' Motion for Attorneys' Fees, Expenses and Service Awards, dated April 16, 2019

EXHIBIT 1

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Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

This Documents Relates to:
ALL ACTIONS

DECLARATION OF PLAINTIFF
JASON AMES IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
EXPENSES, AND SERVICE AWARDS

Date: July 16, 2019
Time: 2:00 p.m.
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, JASON AMES, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd., and
9 SANYO North America Corporation (collectively "Panasonic"); Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"); Toshiba Corporation ("Toshiba"); and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted six hours of record time, where I was questioned by counsel in this case. To
5 ensure the accuracy of my transcript, I spent two hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 40-45 hours performing all of the above-
7 described duties on behalf of the class over the past six years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba, and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 that this is an excellent result in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

10. I believe the settlement agreements between the Settling Defendants and Class Counsel were reached at arms' length, and that the terms of the settlements reflect the independent evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based upon my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreements, I believe the proposed settlements are fair, adequate and reasonable, and in the best interests of class members, and should therefore be granted final approval.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed April 16, 2019, in Portland, Maine.

Jason Ames
JASON AMES

EXHIBIT 2

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Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

This Documents Relates to:
ALL ACTIONS

DECLARATION OF PLAINTIFF
BRIAN CALEB BATEY IN SUPPORT
OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, EXPENSES AND
SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, BRIAN CALEB BATEY, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted 3 hours and 26 minutes of record time, where I was questioned by counsel in
5 this case. To ensure the accuracy of my transcript, I spent about 2.5 hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 80 hours performing all of the above-
7 described duties on behalf of the class over the past six years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

1 10. I believe the settlement agreements between the Settling Defendants and Class
2 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
3 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
4 upon my understanding of the class claims asserted in this litigation, and my understanding of the
5 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
6 reasonable, and in the best interests of class members, and should therefore be granted final
7 approval.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed April 17, 2019, in Cookeville, TN.

10
11 

Brian Caleb Batey

2019.04.17 11:13:05 -05'00'

EXHIBIT 3

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13 *Indirect Purchaser Plaintiffs*
14 *Interim Co-Lead Class Counsel*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 IN RE LITHIUM ION BATTERIES
19 ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

21 This Documents Relates to:
22 ALL ACTIONS
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DECLARATION OF PLAINTIFF
CHRISTOPHER BESSETTE IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, EXPENSES AND
SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, CHRISTOPHER BESSETTE, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted five hours and twenty minutes of record time, where I was questioned by
5 counsel in this case. To ensure the accuracy of my transcript, I spent about two hours reviewing it
6 for errors.

7 7. In total, I estimate that I have spent about fifty hours performing all of the above-
8 described duties on behalf of the class over the past six years. My attorneys have not made any
9 promises regarding compensation for my service, and I willingly agreed to participate in this case
10 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
11 helped to make the settlements possible. I ask that the Court approve my service award in the
12 amount of \$10,000.

13 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
14 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
15 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
16 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
17 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
18 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
19 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
20 governments.

21 9. I believe that the proposed settlements achieve significant recovery for the Class and
22 is an excellent result considered in light of the risks associated with a complex and costly trial. I
23 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
24 case were to go to trial. I understand that after these settlements were reached, this Court denied
25 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
26 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
27 be financially prudent given my damages in this case versus the resources available to the
28

1 international defendants who formed this cartel. The proposed settlements also permit an
2 immediate recovery to class members without the risk, delay, and expense of trial.

3 10. I believe the settlement agreements between the Settling Defendants and Class
4 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
5 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
6 upon my understanding of the class claims asserted in this litigation, and my understanding of the
7 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
8 reasonable, and in the best interests of class members, and should therefore be granted final
9 approval.

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct. Executed April 18, 2019, in the City of Wall, South Dakota.

12
13 
14
15 CHRISTOPHER BESSETTE

EXHIBIT 4

1 Steve W. Berman (*Pro Hac Vice*)
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22 *Indirect Purchaser Plaintiffs*
23 *Interim Co-Lead Class Counsel*

24 UNITED STATES DISTRICT COURT
25 NORTHERN DISTRICT OF CALIFORNIA
26 OAKLAND DIVISION

27 IN RE LITHIUM ION BATTERIES
28 ANTITRUST LITIGATION,

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

MDL No. 2420

This Documents Relates to:

ALL ACTIONS

DECLARATION OF PLAINTIFF
CINDY BOOZE IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
EXPENSES AND SERVICE AWARDS

Date: July 16, 2019

Time: 2:00pm

Judge: Hon. Yvonne Gonzalez Rogers

Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, CINDY BOOZE, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted four hours and 30 minutes of record time, where I was questioned by counsel
5 in this case. To ensure the accuracy of my transcript, I spent one and one-half hours reviewing it
6 for errors.

7 7. In total, I estimate that I have spent about 64 hours performing all of the above-
8 described duties on behalf of the class over the past six years. My attorneys have not made any
9 promises regarding compensation for my service, and I willingly agreed to participate in this case
10 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
11 helped to make the settlements possible. I ask that the Court approve my service award in the
12 amount of \$10,000.

13 8. I have reviewed the terms of the settlements with the SDI, Toshiba and TOKIN
14 defendants, discussed those terms with my attorneys, and I am aware of and approve all terms of
15 the proposed settlements, as it affects me and the members of the Class. Based upon this reading
16 and my discussions with Class Counsel, I understand that these defendants agree to pay \$49 million
17 into a fund to be distributed to the Settlement Class. I understand in general terms that there will be
18 no reversion of unclaimed funds to any defendant. To the extent that money is not able to be
19 reasonably distributed to class members, IPPs propose that the money escheat to state
20 governments.

21 9. I believe that the proposed settlements achieve significant recovery for the Class and
22 is an excellent result considered in light of the risks associated with a complex and costly trial. I
23 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
24 case were to go to trial. I understand that after these settlements were reached, this Court denied
25 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
26 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
27 be financially prudent given my damages in this case versus the resources available to the
28

1 international defendants who formed this cartel. The proposed settlements also permit an
2 immediate recovery to class members without the risk, delay, and expense of trial.

3 10. I believe the settlement agreements between the Settling Defendants and Class
4 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
5 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
6 upon my understanding of the class claims asserted in this litigation, and my understanding of the
7 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
8 reasonable, and in the best interests of class members, and should therefore be granted final
9 approval.

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct. Executed April 10, 2019, in Lincoln, Nebraska.

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15 CINDY BOOZE
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EXHIBIT 5

Steve W. Berman (*Pro Hac Vice*)
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Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

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

MDL No. 2420

This Documents Relates to:
ALL ACTIONS

DECLARATION OF PLAINTIFF MATT
BRYANT IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, EXPENSES
AND SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, MATT BRYANT, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted 7 hours and 20 minutes of record time, where I was questioned by counsel in
5 this case. To ensure the accuracy of my transcript, I spent about 3 hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 85 hours performing all of the above-
7 described duties on behalf of the class over the past six years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

10. I believe the settlement agreements between the Settling Defendants and Class Counsel were reached at arms' length, and that the terms of the settlements reflect the independent evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based upon my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreements, I believe the proposed settlements are fair, adequate and reasonable, and in the best interests of class members, and should therefore be granted final approval.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed April 15, 2019, in Estero, FL.

Matt Bryant
MATT BRYANT

EXHIBIT 6

1 Steve W. Berman (*Pro Hac Vice*)
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13 *Indirect Purchaser Plaintiffs*
14 *Interim Co-Lead Class Counsel*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 IN RE LITHIUM ION BATTERIES
19 ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

21 This Documents Relates to:
22 ALL ACTIONS
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DECLARATION OF PLAINTIFF
STEVEN BUGGE IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
EXPENSES AND SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, STEVEN BUGGE, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years and seven months, I have diligently performed my duty to
19 assist counsel in prosecuting this case, investing significant time and effort to fulfill my role as a
20 class representative. Throughout this litigation, I have remained informed regarding the status of
21 the litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted 5 hours and 12 minutes of record time, where I was questioned by counsel in
5 this case. To ensure the accuracy of my transcript, I spent about 2 hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 45-50 hours performing all of the above-
7 described duties on behalf of the class over the past six years and seven months. My attorneys have
8 not made any promises regarding compensation for my service, and I willingly agreed to
9 participate in this case with no guarantee of personal benefit. I believe that the time, effort, and
10 information I provided helped to make the settlements possible. I ask that the Court approve my
11 service award in the amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

10. I believe the settlement agreements between the Settling Defendants and Class Counsel were reached at arms' length, and that the terms of the settlements reflect the independent evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based upon my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreements, I believe the proposed settlements are fair, adequate and reasonable, and in the best interests of class members, and should therefore be granted final approval.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed April 13, 2019, in Brooklyn, New York.

Steven Bugge

STEVEN BUGGE

EXHIBIT 7

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azapala@cpmlegal.com

Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

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

MDL No. 2420

This Documents Relates to:
ALL ACTIONS

DECLARATION OF PLAINTIFF
WILLIAM CABRAL IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
EXPENSES AND SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, WILLIAM CABRAL, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court. "

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted 7 hours and 10 minutes of record time, where I was questioned by counsel in
5 this case. To ensure the accuracy of my transcript, I spent about hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 25 hours performing all of the above-
7 described duties on behalf of the class over the past six years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

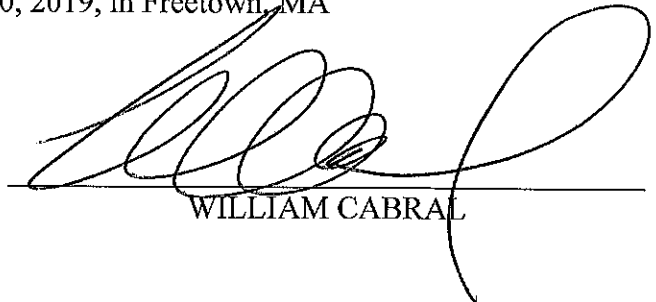
12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlement achieves significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

1 10. I believe the settlement agreements between the Settling Defendants and Class
2 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
3 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
4 upon my understanding of the class claims asserted in this litigation, and my understanding of the
5 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
6 reasonable, and in the best interests of class members, and should therefore be granted final
7 approval.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed April 10, 2019, in Freetown, MA

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WILLIAM CABRAL

EXHIBIT 8

1 *Class Counsel for Indirect Purchaser Plaintiffs*

2
3 **UNITED STATES DISTRICT COURT**
4 **NORTHERN DISTRICT OF CALIFORNIA**
5 **OAKLAND DIVISION**

6 **IN RE LITHIUM ION BATTERIES**
7 **ANTITRUST LITIGATION,**

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

MDL No. 2420

8
9 **This Documents Relates to:**

10 **ALL ACTIONS**

DECLARATION OF TERENCE
HOWZELL (ON BEHALF OF
PLAINTIFF CITY OF PALO ALTO)
IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
COSTS AND SERVICE AWARDS

Date: July 16, 2019

Time: 2:00 p.m.

Dept: Courtroom 1, 4th Floor

Judge: Hon. Yvonne Gonzalez Rogers

DATE ACTION FILED: Oct. 3, 2012

1 I, Terence Howzell, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am Chief
3 Assistant City Attorney with Palo Alto City Attorney's Office. I have personal knowledge of the
4 matters stated herein and, if called upon, I could and would competently testify thereto.

5 2. The City of Palo Alto ("Palo Alto" or the "City") is a representative of the
6 governmental entity subclass in *In re Lithium Ion Batteries Antitrust Litigation*, No. 13-md-02420,
7 filed in the United States District Court for the Northern District of California. I submit this
8 affidavit on Palo Alto's behalf and the settlement class, in support of Class Counsel's motion for
9 attorneys' fees, expenses, and service awards and in support of final approval of the settlements
10 with Samsung SDI Co., LTD and Samsung SDI America, Inc. (collectively "SDI"), TOKIN
11 Corporation ("TOKIN"); Toshiba Corporation ("Toshiba"); and Panasonic Corporation, Panasonic
12 Corporation of North America, SANYO Electric Co., Ltd., and SANYO North America
13 Corporation (collectively "Panasonic") (collectively, the "Settling Defendants").¹

14 3. As a class representative, Palo Alto is responsible for being informed of the work
15 done by its attorneys on the case and make its own judgment about the fairness of any settlement
16 proposed by the lawyers.

17 4. In evaluating the fairness of the settlement, Palo Alto is also required to consider the
18 interests of all members of the Class, as well as its own, and is free to disagree with its attorneys
19 about the merits of a settlement and make its views known to the court.

20 5. Over the past four years, Palo Alto – through its employees, including personnel
21 within the City Attorney's Office – has worked diligently to perform its duty to assist. It retained
22 outside counsel, Sloan Sakai Yeung & Wong LLP ("SSYW," formerly known as Renne Sloan
23 Holtzman Sakai LLP), Renne Public Law Group ("RPLG") and Bleichmar Fonti & Auld LLP
24 ("BFA") – and invested significant time and effort to fulfill its role as a class representative.

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26 ¹ Throughout this declaration, the term "Co-Lead Counsel" refers to the law firms of
27 Cotchett, Pitre & McCarthy, LLP, Hagens Berman Sobol Shapiro LLP, and Lieff Cabraser
28 Heimann & Bernstein, LLP. The term "Supporting Counsel" refers to the law firms that assisted
Co-Lead Counsel in litigating this case. The term "Class Counsel" refers to all the attorneys and
law firms that represented IPPs in this case, including Co-Lead Counsel and Supporting Counsel.

1 Throughout this litigation, Palo Alto has remained informed regarding the status of the litigation by
2 communicating with its attorneys, including reviewing periodic update correspondence from
3 counsel and key case documents. Moreover, since the outset of the litigation, Palo Alto has
4 diligently retained all documents or electronic information that could be relevant to the litigation
5 and provided a large bulk of these documents to its attorneys.

6 6. As a Class Representative, multiple Palo Alto personnel also assisted in responding
7 to discovery throughout the case. This included reviewing discovery requests from defendants,
8 discussing them with counsel, reviewing proposed responses, making any corrections, and signing
9 off on the responses. In total, Palo Alto has assisted counsel in responding to a total of 22
10 interrogatories, 37 requests for production of documents, and 4 requests for admission. Palo Alto
11 personnel, including employees assigned to its IT and procurement departments, have also spent a
12 significant amount of time locating relevant purchase orders, receipts and other documents
13 requested by the defendants in this litigation. These public employees did so in part to assist the
14 Class in making sure that all Class purchases were covered.

15 7. Palo Alto has also contributed to the discovery process in this case by producing
16 David Ramberg, Assistant Director to the City's Administrative Services department, as its person
17 most knowledgeable in response to Defendants Samsung SDI Co., LTD and Samsung SDI
18 American, Inc.'s FRCP 30(b)(6) deposition notice. In preparation for his deposition, Mr. Ramberg
19 spent approximately 30 hours conferring with the City's retained outside counsel and reviewing
20 documents produced by the City in discovery. In total, Mr. Ramberg's deposition lasted
21 approximately eight hours, during which he was questioned by counsel in this case. Mr. Ramberg
22 was an exceptionally well-prepared witness.

23 8. In total, I estimate that Palo Alto has spent over 220 hours performing all of the
24 above-described duties on behalf of the class over the past four years. Palo Alto's retained outside
25 counsel have not made any promises regarding compensation for these services, and the City
26 willingly agreed to participate in this case with no guarantee of any benefit whatsoever. The City
27 has also consulted with Class Counsel regarding the preparation of complaints, class certification
28 papers, and proposed settlement agreements.

1 9. Based on information obtained from its attorneys, the City believes that the time,
2 effort, and information it provided helped to make the settlement possible. Accordingly, the City
3 respectfully requests that the Court approve a service award on its behalf in the amount of \$25,000.

4 10. Attorneys in the City Attorney's Office have reviewed the terms of the settlements
5 with the SDI, TOKIN, Toshiba, and Panasonic defendants, discussed those terms with the City's
6 outside counsel. Palo Alto is aware of and approves all terms of the proposed settlements, as it
7 affects the City and the members of the Class.

8 11. Based upon this reading and discussions with Class Counsel, the City understands in
9 general terms that the monies from a settlement agreement will be distributed on a *pro rata* basis to
10 class members based on: (1) the number of Lithium Ion Batteries purchased by the class member;
11 and (2) the number of valid claims filed. Palo Alto also understands that there will be no reversion
12 of unclaimed funds to any defendant and, to the extent that money is not able to be reasonably
13 distributed to class members, it may escheat to federal or state governments.

14 12. Palo Alto believes that the proposed settlements represent significant recoveries for
15 the class, and are excellent results considered in light of the risks associated with a complex and
16 costly trial. The City recognizes the uncertainty of success on any or all of the claims presented in
17 this litigation if this case were to go to trial.

18 13. Palo Alto understands that after these settlements were reached, this Court denied
19 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
20 this. The City believes that litigation of this case on its own behalf, and not on behalf of a class,
21 would not be financially prudent given its damages in this case versus the resources available to the
22 international defendants who formed this cartel. The proposed settlements also permit an
23 immediate recovery to class members without the risk, delay, and expense of trial.

24 14. Palo Alto understands these settlement agreements were reached at arms' length.
25 Based upon its understanding of the class claims asserted in this litigation and its understanding of
26 the terms of the settlement agreement, the City believes the proposed settlements are fair, adequate
27 and reasonable, and in the best interests of class members, and should therefore be granted final
28 approval.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed April 17, 2019, in Palo Alto, California.

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6 Terence Howzell
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EXHIBIT 9

Class Counsel for Indirect Purchaser Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

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

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

MDL No. 2420

**This Documents Relates to:
ALL ACTIONS**

**DECLARATION OF SHANNON
MOORE (ON BEHALF OF
PLAINTIFF CITY OF RICHMOND)
IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
COSTS AND SERVICE AWARDS**

Date: July 16, 2019

Time: 2:00 p.m.

Dept: Courtroom 1, 4th Floor

Judge: Hon. Yvonne Gonzalez Rogers

DATE ACTION FILED: Oct. 3, 2012

1 I, Shannon Moore, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am an Assistant
3 City Attorney with Richmond City Attorney's Office. I have personal knowledge true of the
4 matters stated herein and, if called upon, I could and would competently testify thereto.

5 2. The City of Richmond ("Richmond" or the "City") is a representative of the
6 governmental entity subclass in *In re Lithium Ion Batteries Antitrust Litigation*, No. 13-md-02420,
7 filed in the United States District Court for the Northern District of California. I submit this
8 affidavit on Richmond's behalf and the settlement class, in support of Class Counsel's motion for
9 attorneys' fees, expenses, and service awards and in support of final approval of the settlements
10 with Samsung SDI Co., LTD and Samsung SDI America, Inc. (collectively "SDI"), TOKIN
11 Corporation ("TOKIN"); Toshiba Corporation ("Toshiba"); and Panasonic Corporation, Panasonic
12 Corporation of North America, SANYO Electric Co., Ltd., and SANYO North America
13 Corporation (collectively "Panasonic") (collectively, the "Settling Defendants").¹

14 3. As a class representative, Richmond is responsible for being informed of the work
15 done by its attorneys on the case and make its own judgment about the fairness of any settlement
16 proposed by the lawyers.

17 4. In evaluating the fairness of the settlement, Richmond is also required to consider
18 the interests of all members of the Class, as well as its own, and is free to disagree with its
19 attorneys about the merits of a settlement and make its views known to the court.

20 5. Over the past four years, Richmond – through its employees, including attorneys in
21 the City Attorney's Office – has worked diligently to perform its duty to assist. It retained outside
22 counsel – Sloan Sakai Yeung & Wong LLP ("SSYW," formerly known as Renne Sloan Holtzman
23 Sakai LLP), Renne Public Law Group ("RPLG") and Bleichmar Fonti & Auld LLP ("BFA") – and
24 invested significant time and effort to fulfill its role as a class representative. Throughout this
25

26 ¹ Throughout this declaration, the term "Co-Lead Counsel" refers to the law firms of
27 Cotchett, Pitre & McCarthy, LLP, Hagens Berman Sobol Shapiro LLP, and Lieff Cabraser
28 Heimann & Bernstein, LLP. The term "Supporting Counsel" refers to the law firms that assisted
Co-Lead Counsel in litigating this case. The term "Class Counsel" refers to all the attorneys and
law firms that represented IPPs in this case, including Co-Lead Counsel and Supporting Counsel.

1 litigation, Richmond has remained informed regarding the status of the litigation by
2 communicating with its attorneys, including reviewing periodic update correspondence from
3 counsel and key case documents. Moreover, since the outset of the litigation, Richmond has
4 diligently retained all documents or electronic information that could be relevant to the litigation
5 and provided a large bulk of these documents to its attorneys.

6 6. As a Class Representative, Richmond personnel also assisted in responding to
7 discovery throughout the case. This included reviewing discovery requests from defendants,
8 discussing them with counsel, reviewing proposed responses, making any corrections, and signing
9 off on the responses. In total, Richmond has assisted counsel in responding to a total of 22
10 interrogatories, 37 requests for production of documents, and 4 requests for admission. Richmond
11 personnel, including employees assigned to its IT and finance departments, have also spent a
12 significant amount of time locating relevant purchase orders, receipts and other documents
13 requested by the defendants in this litigation. These public employees spent many hours digging
14 through and analyzing records of purchases of many products containing lithium ion batteries to
15 ensure that the Class's claims were adequately covered.

16 7. Richmond has also contributed to the discovery process in this case by producing
17 Sue Hartman, Director of the City's Information Technology Department, as its person most
18 knowledgeable in response to Defendants Samsung SDI Co., LTD and Samsung SDI American,
19 Inc.'s FRCP 30(b)(6) deposition notice. In preparation for her deposition, Ms. Hartman spent
20 approximately 30 hours conferring with the City's retained outside counsel and reviewing
21 documents produced by the City in discovery. She was a diligent, thoughtful, effective and highly
22 prepared witness. In total, Ms. Hartman's deposition lasted approximately eight hours, during
23 which she was questioned by counsel in this case.

24 8. In total, I estimate that Richmond has spent over 220 hours performing all of the
25 above-described duties on behalf of the class over the past four years. Richmond's retained outside
26 counsel have not made any promises regarding compensation for these services, and the City
27 willingly agreed to participate in this case with no guarantee of any benefit whatsoever. The City
28

1 has also consulted with Class Counsel regarding the preparation of complaints, class certification
2 papers, and proposed settlement agreements.

3 9. Based on information obtained from its attorneys, the City believes that the time,
4 effort, and information it provided helped to make the settlement possible. Accordingly, the City
5 respectfully requests that the Court approve a service award on its behalf in the amount of \$25,000.

6 10. Attorneys in the City Attorney's Office have reviewed the terms of the settlements
7 with the SDI, TOKIN, Toshiba, and Panasonic defendants, and discussed those terms with the
8 City's outside counsel. Richmond is aware of and approves all terms of the proposed settlements,
9 as it affects the City and the members of the Class.

10 11. Based upon this reading and discussions with Class Counsel, the City understands in
11 general terms that the monies will be distributed on a *pro rata* basis to class members based on: (1)
12 the number of Lithium Ion Batteries purchased by the class member; and (2) the number of valid
13 claims filed. Richmond also understands that there will be no reversion of unclaimed funds to any
14 defendant and, to the extent that money is not able to be reasonably distributed to class members, it
15 may escheat to federal or state governments.

16 12. Richmond believes that the proposed settlements represent significant recoveries for
17 the class, and are excellent results considered in light of the risks associated with a complex and
18 costly trial. The City recognizes the uncertainty of success on any or all of the claims presented in
19 this litigation if this case were to go to trial.

20 13. Richmond understands that after these settlements were reached, this Court denied
21 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
22 this. The City believes that litigation of this case on its own behalf, and not on behalf of a class,
23 would not be financially prudent given its damages in this case versus the resources available to the
24 international defendants who formed this cartel. The proposed settlements also permit an
25 immediate recovery to class members without the risk, delay, and expense of trial.

26 14. Richmond understands these settlement agreements were reached at arms' length.
27 Based upon its understanding of the class claims asserted in this litigation and its understanding of
28 the terms of the settlement agreement, the City believes the proposed settlements are fair, adequate

1 and reasonable, and in the best interests of class members, and should therefore be granted final
2 approval.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct. Executed April 16, 2019, in Richmond, California.

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7 
Shannon Moore

EXHIBIT 10

1 Steve W. Berman (*Pro Hac Vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
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13 *Indirect Purchaser Plaintiffs*
14 *Interim Co-Lead Class Counsel*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 IN RE LITHIUM ION BATTERIES
19 ANTITRUST LITIGATION,

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

MDL No. 2420

20
21 This Documents Relates to:
22 ALL ACTIONS
23

DECLARATION OF PLAINTIFF
MATTHEW ENCE IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
EXPENSES AND SERVICE AWARDS

24 Date: July 16, 2019

Time: 2:00pm

25 Judge: Hon. Yvonne Gonzalez Rogers

Court: Courtroom 1, 4th Floor

26
27 DATE ACTION FILED: Oct. 3, 2012
28

1 I, MATTHEW ENCE, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past 3.5 years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. In total, I estimate that I have spent about 15-18 hours performing all of the above-
4 described duties on behalf of the class over the past 3.5 years. My attorneys have not made any
5 promises regarding compensation for my service, and I willingly agreed to participate in this case
6 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
7 helped to make the settlements possible. I ask that the Court approve my service award in the
8 amount of \$10,000.

9 7. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
10 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
11 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
12 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
13 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
14 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
15 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
16 governments.

17 8. I believe that the proposed settlements achieve significant recovery for the Class and
18 is an excellent result considered in light of the risks associated with a complex and costly trial. I
19 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
20 case were to go to trial. I understand that after these settlements were reached, this Court denied
21 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
22 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
23 be financially prudent given my damages in this case versus the resources available to the
24 international defendants who formed this cartel. The proposed settlements also permit an
25 immediate recovery to class members without the risk, delay, and expense of trial.

26 9. I believe the settlement agreements between the Settling Defendants and Class
27 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
28 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based

1 upon my understanding of the class claims asserted in this litigation, and my understanding of the
2 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
3 reasonable, and in the best interests of class members, and should therefore be granted final
4 approval.

5 I declare under penalty of perjury under the laws of the United States of America that the
6 foregoing is true and correct. Executed April 10, 2019, in Minden, Nevada.

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MATTHEW ENCE

EXHIBIT 11

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13 *Indirect Purchaser Plaintiffs*
14 *Interim Co-Lead Class Counsel*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 IN RE LITHIUM ION BATTERIES
19 ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

21 This Documents Relates to:
22 ALL ACTIONS
23
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DECLARATION OF PLAINTIFF DREW
FENNELLY IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
EXPENSES AND SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, DREW FENNELLY, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past four years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted three hours and thirty minutes of record time, where I was questioned by
5 counsel in this case. To ensure the accuracy of my transcript, I spent two hours reviewing it for
6 errors.

7 7. In total, I estimate that I have spent about 45-65 hours performing all of the above-
8 described duties on behalf of the class over the past four years. My attorneys have not made any
9 promises regarding compensation for my service, and I willingly agreed to participate in this case
10 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
11 helped to make the settlement possible. I ask that the Court approve my service award in the
12 amount of \$10,000.

13 8. I have reviewed the terms of the settlements with the SDI, Toshiba and TOKIN
14 defendants, discussed those terms with my attorneys, and I am aware of and approve all terms of
15 the proposed settlements, as it affects me and the members of the Class. Based upon this reading
16 and my discussions with Class Counsel, I understand that these defendants agree to pay \$49 million
17 into a fund to be distributed to the Settlement Class. I understand in general terms that there will be
18 no reversion of unclaimed funds to any defendant. To the extent that money is not able to be
19 reasonably distributed to class members, IPPs propose that the money escheat to state
20 governments.

21 9. I believe that the proposed settlements achieve significant recovery for the Class and
22 is an excellent result considered in light of the risks associated with a complex and costly trial. I
23 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
24 case were to go to trial. I understand that after these settlements were reached, this Court denied
25 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
26 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
27 be financially prudent given my damages in this case versus the resources available to the
28

1 international defendants who formed this cartel. The proposed settlements also permit an
2 immediate recovery to class members without the risk, delay, and expense of trial.

3 10. I believe the settlement agreements between the Settling Defendants and Class
4 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
5 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
6 upon my understanding of the class claims asserted in this litigation, and my understanding of the
7 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
8 reasonable, and in the best interests of class members, and should therefore be granted final
9 approval.

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct. Executed April 10, 2019, in Lawrence, Kansas.

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DREW FENNELLY

EXHIBIT 12

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21 azapala@cpmlegal.com

22 *Indirect Purchaser Plaintiffs*
23 *Interim Co-Lead Class Counsel*

24 UNITED STATES DISTRICT COURT
25 NORTHERN DISTRICT OF CALIFORNIA
26 OAKLAND DIVISION

27 IN RE LITHIUM ION BATTERIES
28 ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

This Documents Relates to:
ALL ACTIONS

DECLARATION OF PLAINTIFF SHERI
HARMON IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, EXPENSES
AND SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, SHERI HARMON, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted six hours and nine minutes of record time, where I was questioned by counsel
5 in this case. To ensure the accuracy of my transcript, I spent two hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 45 hours performing all of the above-
7 described duties on behalf of the class over the past six years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed April 13, 2019, in Mulino, Or..

Sheri Harmon
SHERI HARMON

EXHIBIT 13

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12 azapala@cpmlegal.com

13 *Indirect Purchaser Plaintiffs*
14 *Interim Co-Lead Class Counsel*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 IN RE LITHIUM ION BATTERIES
19 ANTITRUST LITIGATION,

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

MDL No. 2420

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21 This Documents Relates to:
22 ALL ACTIONS
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DECLARATION OF PLAINTIFF
CHRISTOPHER HUNT IN SUPPORT
OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, EXPENSES AND
SERVICE AWARDS

Date: July 16, 2019

Time: 2:00pm

Judge: Hon. Yvonne Gonzalez Rogers

Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, CHRISTOPHER HUNT, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted 7 hours and 14 minutes of record time, where I was questioned by counsel in
5 this case. To ensure the accuracy of my transcript, I spent 9 1/2 hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 80-90 hours performing all of the above-
7 described duties on behalf of the class over the past six years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

1 10. I believe the settlement agreements between the Settling Defendants and Class
2 Counsel were reached at arms' length, and that the terms of the settlement reflect the independent
3 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
4 upon my understanding of the class claims asserted in this litigation, and my understanding of the
5 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
6 reasonable, and in the best interests of class members, and should therefore be granted final
7 approval.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed April 11, 2019, in Phoenix, Arizona.

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CHRISTOPHER HUNT

EXHIBIT 14

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Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

This Documents Relates to:
ALL ACTIONS

DECLARATION OF PLAINTIFF JOHN
KOPP IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, EXPENSES
AND SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, JOHN KOPP, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past 3.5 years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and


1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted eight hours of record time, where I was questioned by counsel in this case. To
5 ensure the accuracy of my transcript, I spent two hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 52 hours performing all of the above-
7 described duties on behalf of the class over the past 3.5 years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.



JOHN KOPP

EXHIBIT 15

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13 *Indirect Purchaser Plaintiffs*
14 *Interim Co-Lead Class Counsel*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 IN RE LITHIUM ION BATTERIES
19 ANTITRUST LITIGATION,

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

MDL No. 2420

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21 This Documents Relates to:
22 ALL ACTIONS
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DECLARATION OF PLAINTIFF
LINDA LINCOLN IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
EXPENSES AND SERVICE AWARDS

Date: July 16, 2019

Time: 2:00pm

Judge: Hon. Yvonne Gonzalez Rogers

Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, LINDA LINCOLN, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

LINDA LINCOLN DECL. ISO IPFS' MOT. FOR ATTYS' FEES,
COSTS AND SERVICE AWARDS – Case No. 4:13-md-02420-YGR

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted 4 hours and 13 minutes of record time, where I was questioned by counsel in
5 this case. To ensure the accuracy of my transcript, I spent about 2 hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 38-48 hours performing all of the above-
7 described duties on behalf of the class over the past six years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.


LINDA LINCOLN

EXHIBIT 16

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Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

This Documents Relates to:
ALL ACTIONS

DECLARATION OF PLAINTIFF
PATRICK MCGUINNESS IN SUPPORT
OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, EXPENSES AND
SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, PATRICK MCGUINNESS, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past 6 1/2 years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted 7 hours and 56 minutes of record time, where I was questioned by counsel in
5 this case. To ensure the accuracy of my transcript, I spent about 4 hours reviewing it for errors.

6 7. I estimate that I have spent about thirty-six hours performing all of the above-
7 described duties on behalf of the class over the past 6 1/2 years. In addition to the forgoing I had
8 two complete travel days from Jacksonville, FL to Los Angeles, California to attend my deposition
9 in February 2016. Preparation, testimony, document review, record searches, attorney client
10 conferences and travel time (approximately 16 hours) totaled approximately **fifty-two hours**. My
11 attorneys have not made any promises regarding compensation for my service, and I willingly
12 agreed to participate in this case with no guarantee of personal benefit. I believe that the time,
13 effort, and information I provided helped to make the settlements possible. I ask that the Court
14 approve my service award in the amount of \$10,000.

15 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
16 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
17 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
18 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
19 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
20 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
21 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
22 governments.

23 9. I believe that the proposed settlements achieve significant recovery for the Class and
24 is an excellent result considered in light of the risks associated with a complex and costly trial. I
25 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
26 case were to go to trial. I understand that after these settlements were reached, this Court denied
27 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
28 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not

1 be financially prudent given my damages in this case versus the resources available to the
2 international defendants who formed this cartel. The proposed settlements also permit an
3 immediate recovery to class members without the risk, delay, and expense of trial.

4 10. I believe the settlement agreements between the Settling Defendants and Class
5 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
6 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
7 upon my understanding of the class claims asserted in this litigation, and my understanding of the
8 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
9 reasonable, and in the best interests of class members, and should therefore be granted final
10 approval.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct. Executed April 13, 2019, in Jacksonville, Florida.

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PATRICK MCGUINNESS

EXHIBIT 17

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21 azapala@cpmlegal.com

22 *Indirect Purchaser Plaintiffs*
23 *Interim Co-Lead Class Counsel*

24 UNITED STATES DISTRICT COURT
25 NORTHERN DISTRICT OF CALIFORNIA
26 OAKLAND DIVISION

27 IN RE LITHIUM ION BATTERIES
28 ANTITRUST LITIGATION,

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

MDL No. 2420

29 This Documents Relates to:
30 ALL ACTIONS

DECLARATION OF PLAINTIFF
JOSEPH O'DANIEL IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
EXPENSES AND SERVICE AWARDS

Date: July 16, 2019

Time: 2:00pm

Judge: Hon. Yvonne Gonzalez Rogers

Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, JOSEPH O'DANIEL, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted three hours and 27 minutes of record time, where I was questioned by counsel
5 in this case. To ensure the accuracy of my transcript, I spent about 2.5 hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 40 hours performing all of the above-
7 described duties on behalf of the class over the past six years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlement possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

10. I believe the settlement agreements between the Settling Defendants and Class Counsel were reached at arms' length, and that the terms of the settlements reflect the independent evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based upon my understanding of the class claims asserted in this litigation, and my understanding of the terms of the settlement agreements, I believe the proposed settlements are fair, adequate and reasonable, and in the best interests of class members, and should therefore be granted final approval.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed April 12, 2019, in Lee's Summit, Missouri.


JOSEPH O'DANIEL

EXHIBIT 18

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Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

This Documents Relates to:
ALL ACTIONS

DECLARATION OF PLAINTIFF TOM
PHAM IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, EXPENSES
AND SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, TOM PHAM, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past 6 and 1/2 years, I have diligently performed my duty to assist counsel
19 in prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted 4 hours and 42 minutes of record time, where I was questioned by counsel in
5 this case. To ensure the accuracy of my transcript, I spent about 2 hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 40 hours performing all of the above-
7 described duties on behalf of the class over the past 6 and 1/2 years. My attorneys have not made
8 any promises regarding compensation for my service, and I willingly agreed to participate in this
9 case with no guarantee of personal benefit. I believe that the time, effort, and information I
10 provided helped to make the settlements possible. I ask that the Court approve my service award in
11 the amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlement achieves significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

1 10. I believe the settlement agreements between the Settling Defendants and Class
2 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
3 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
4 upon my understanding of the class claims asserted in this litigation, and my understanding of the
5 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
6 reasonable, and in the best interests of class members, and should therefore be granted final
7 approval.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed April 10, 2019, in [Huntington Beach, CA].

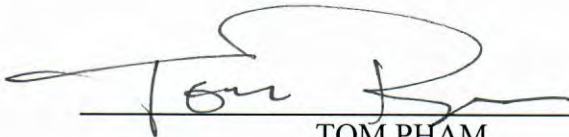
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13 TOM PHAM

EXHIBIT 19

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22 *Indirect Purchaser Plaintiffs*
23 *Interim Co-Lead Class Counsel*

24 UNITED STATES DISTRICT COURT
25 NORTHERN DISTRICT OF CALIFORNIA
26 OAKLAND DIVISION

27 IN RE LITHIUM ION BATTERIES
28 ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

This Documents Relates to:
ALL ACTIONS

DECLARATION OF PLAINTIFF PIYA
ROBERT ROJANASATHIT IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, EXPENSES AND
SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, PIYA ROBERT ROJANASATHIT, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past 7 years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted 5 hours and 18 minutes of record time, where I was questioned by counsel in
5 this case. To ensure the accuracy of my transcript, I spent 2 hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 27-33 hours performing all of the above-
7 described duties on behalf of the class over the past 7 years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

1 10. I believe the settlement agreements between the Settling Defendants and Class
2 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
3 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
4 upon my understanding of the class claims asserted in this litigation, and my understanding of the
5 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
6 reasonable, and in the best interests of class members, and should therefore be granted final
7 approval.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed April 16, 2019, in [San Carlos, CA].

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PIYA ROBERT ROJANASATHIT

EXHIBIT 20

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azapala@cpmlegal.com

Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

This Documents Relates to:

ALL ACTIONS

DECLARATION OF PLAINTIFF
BRADLEY SELDIN IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
EXPENSES AND SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, BRADLEY SELDIN, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this declaration, on behalf of myself and the settlement class, in support of plaintiffs'
7 motion for attorneys' fees, expenses, and service awards and in support of final approval of the
8 settlements with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co.,
9 Ltd. and SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd.
10 and Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and
11 TOKIN Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted 4 hours and 25 minutes of record time, where I was questioned by counsel in
5 this case. To ensure the accuracy of my transcript, I spent 1.5 hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 50-55 hours performing all of the above-
7 described duties on behalf of the class over the past six years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.


12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that this Court denied class certification. This denial
24 highlights the risks that plaintiffs face in collective actions such as this. I believe that litigation of
25 this case on my own behalf, and not on behalf of a class, would not be financially prudent given
26 my damages in this case versus the resources available to the international defendants who formed
27 this cartel. The proposed settlements also permit an immediate recovery to class members without
28 the risk, delay, and expense of trial.

1 10. I believe the settlement agreements between the Settling Defendants and Class
2 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
3 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
4 upon my understanding of the class claims asserted in this litigation, and my understanding of the
5 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
6 reasonable, and in the best interests of class members, and should therefore be granted final
7 approval.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed April 10, 2019, in Miami Beach, FL.

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BRADLEY SELDIN

EXHIBIT 21

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12 azapala@cpmlegal.com

13 *Indirect Purchaser Plaintiffs*
14 *Interim Co-Lead Class Counsel*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 IN RE LITHIUM ION BATTERIES
19 ANTITRUST LITIGATION,

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

MDL No. 2420

20
21 This Documents Relates to:
22 ALL ACTIONS
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DECLARATION OF PLAINTIFF
DONNA SHAWN IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
EXPENSES AND SERVICE AWARDS

Date: July 16, 2019

Time: 2:00pm

Judge: Hon. Yvonne Gonzalez Rogers

Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, DONNA SHAWN, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past 4 years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted five hours and 20 minutes of record time, where I was questioned by counsel
5 in this case. To ensure the accuracy of my transcript, I spent three hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 40-50 hours performing all of the above-
7 described duties on behalf of the class over the past 4 years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlement possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

1 10. I believe the settlement agreements between the Settling Defendants and Class
2 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
3 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
4 upon my understanding of the class claims asserted in this litigation, and my understanding of the
5 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
6 reasonable, and in the best interests of class members, and should therefore be granted final
7 approval.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed April 15, 2019, in Rochester Hills, MI.

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13 DONNA SHAWN
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EXHIBIT 22

Steve W. Berman (*Pro Hac Vice*)
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azapala@cpmlegal.com

Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

This Documents Relates to:
ALL ACTIONS

DECLARATION OF PLAINTIFF
DAVID TOLCHIN IN SUPPORT OF
INDIRECT PURCHASER PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
EXPENSES AND SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, DAVID TOLCHIN, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this affidavit, on behalf of myself and the settlement class, in support of plaintiffs' motion
7 for attorneys' fees, expenses, and service awards and in support of final approval of the settlements
8 with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co., Ltd. and
9 SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd. and
10 Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and TOKIN
11 Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted three hours and 40 minutes of record time, where I was questioned by counsel
5 in this case. To ensure the accuracy of my transcript, I spent two hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 109 hours performing all of the above-
7 described duties on behalf of the class over the past six years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

1 10. I believe the settlement agreements between the Settling Defendants and Class
2 Counsel were reached at arms' length, and that the terms of the settlements reflect the independent
3 evaluation of these Settling Defendants and Class Counsel of their respective best interests. Based
4 upon my understanding of the class claims asserted in this litigation, and my understanding of the
5 terms of the settlement agreements, I believe the proposed settlements are fair, adequate and
6 reasonable, and in the best interests of class members, and should therefore be granted final
7 approval.

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

10 Executed April 10, 2019, in New York, NY.

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14 _____
15 DAVID TOLCHIN
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EXHIBIT 23

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Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION,

Case No. 13-MD-02420 YGR (DMR)
MDL No. 2420

This Documents Relates to:
ALL ACTIONS

DECLARATION OF PLAINTIFF
BRADLEY VAN PATTEN IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES, EXPENSES AND
SERVICE AWARDS

Date: July 16, 2019
Time: 2:00pm
Judge: Hon. Yvonne Gonzalez Rogers
Court: Courtroom 1, 4th Floor

DATE ACTION FILED: Oct. 3, 2012

1 I, BRADLEY VAN PATTEN, declare as follows:

2 1. I am an individual over the age of 18. I have personal knowledge of the matters
3 stated herein and, if called upon, I could and would competently testify thereto.

4 2. I am a class representative in *In re Lithium Ion Batteries Antitrust Litigation*, No.
5 13-md-02420, filed in the United States District Court for the Northern District of California. I
6 submit this declaration, on behalf of myself and the settlement class, in support of plaintiffs'
7 motion for attorneys' fees, expenses, and service awards and in support of final approval of the
8 settlements with Panasonic Corp., Panasonic Corporation of North America, SANYO Electric Co.,
9 Ltd. and SANYO North America Corporation (collectively "Panasonic"), Samsung SDI Co., Ltd.
10 and Samsung SDI America, Inc. (collectively "SDI"), Toshiba Corporation ("Toshiba"), and
11 TOKIN Corporation ("TOKIN").

12 3. As a class representative, I understand that it is my responsibility to be informed of
13 the work done by my attorneys on the case and make my own judgment about the fairness of any
14 settlement proposed by the lawyers. I also understand that in evaluating the fairness of the
15 settlements, I am required to consider the interests of all members of the Class, as well as my own.
16 I am free to disagree with my attorneys about the merits of a settlement and make my views known
17 to the court.

18 4. Over the past six years, I have diligently performed my duty to assist counsel in
19 prosecuting this case, investing significant time and effort to fulfill my role as a class
20 representative. Throughout this litigation, I have remained informed regarding the status of the
21 litigation by communicating with my attorneys, including reviewing periodic update
22 correspondence from my counsel and key case documents. Since the outset of the litigation, I have
23 also diligently retained all papers or electronic information that could be relevant to the litigation
24 and provided these to my attorneys.

25 5. Throughout the case I have also assisted in responding to discovery. This included
26 reviewing discovery requests from defendants, discussing them with my counsel, reviewing
27 proposed responses, making any corrections, and signing off on the responses. In total, I assisted
28 counsel in responding to a total of 22 interrogatories, 37 requests for production of documents, and

1 4 requests for admission. I also spent a significant amount of time locating purchase receipts and
2 the other documents requested by the defendants in this litigation.

3 6. I have also contributed to the discovery process by sitting for a deposition. In total,
4 my deposition lasted 7.5 hours of record time, where I was questioned by counsel in this case. To
5 ensure the accuracy of my transcript, I spent 1.5 hours reviewing it for errors.

6 7. In total, I estimate that I have spent about 48 hours performing all of the above-
7 described duties on behalf of the class over the past six years. My attorneys have not made any
8 promises regarding compensation for my service, and I willingly agreed to participate in this case
9 with no guarantee of personal benefit. I believe that the time, effort, and information I provided
10 helped to make the settlements possible. I ask that the Court approve my service award in the
11 amount of \$10,000.

12 8. I have reviewed the terms of the settlements with the Panasonic, SDI, Toshiba and
13 TOKIN defendants, discussed those terms with my attorneys, and I am aware of and approve all
14 terms of the proposed settlements, as it affects me and the members of the Class. Based upon this
15 reading and my discussions with Class Counsel, I understand that these defendants agree to pay
16 \$49 million into a fund to be distributed to the Settlement Class. I understand in general terms that
17 there will be no reversion of unclaimed funds to any defendant. To the extent that money is not
18 able to be reasonably distributed to class members, IPPs propose that the money escheat to state
19 governments.

20 9. I believe that the proposed settlements achieve significant recovery for the Class and
21 is an excellent result considered in light of the risks associated with a complex and costly trial. I
22 recognize the uncertainty of success on any or all of the claims presented in this litigation if this
23 case were to go to trial. I understand that after these settlements were reached, this Court denied
24 class certification. This denial highlights the risks that plaintiffs face in collective actions such as
25 this. I believe that litigation of this case on my own behalf, and not on behalf of a class, would not
26 be financially prudent given my damages in this case versus the resources available to the
27 international defendants who formed this cartel. The proposed settlements also permit an
28 immediate recovery to class members without the risk, delay, and expense of trial.

1 international defendants who formed this cartel. The proposed settlements also permit an
 2 immediate recovery to class members without the risk, delay, and expense of trial.

3 10. I believe the settlement agreements between the Settling Defendants and Class
 4 Counsel were reached at arms' length, and that the terms of the settlements reflect the
 5 independent evaluation of these Settling Defendants and Class Counsel of their respective best
 6 interests. Based upon my understanding of the class claims asserted in this litigation, and my
 7 understanding of the terms of the settlement agreements, I believe the proposed settlements are
 8 fair, adequate and reasonable, and in the best interests of class members, and should therefore be
 9 granted final approval.

10 I declare under penalty of perjury under the laws of the United States of America that the
 11 foregoing is true and correct. Executed April 16, 2019, in [City, State]. Solana Beach, CA



BRADLEY VAN PATTEN